Accountability to Affected Populations (AAP) has been part of the humanitarian reform agenda for decades. It is one of the four mandatory responsibilities of the Humanitarian Country Teams (HCT) as endorsed by the Inter-Agency Standing Committee (IASC) Principals and is highlighted as one of the IASC Strategic Priorities for 2022-2023 and in the Grand Bargain 2.0 framework. In Lebanon, the HCT agreed on joint priorities articulated around the five IASC AAP outcomes to pave the way for collective AAP in Lebanon. As such, strengthening AAP is one of the cross-cutting priorities across response frameworks.

Complaints and feedback mechanisms are a critical component of AAP. These are the key channels through which humanitarian actors can give account (ensure affected communities are informed enough to provide input on critical processes), take account (involve affected communities in decision making processes and programme design), and be held to account (provide opportunities for affected communities to give feedback and complain). Through this, AAP can inform and improve all parts of the humanitarian response and work to ensure that humanitarian organizations are not only accountable for achieving results, but also for how programmes and initiatives are implemented.

The primary objective of a complaints and feedback mechanism (CFM) is to increase the influence of affected communities over programmes through providing a formal channel where they input on its quality and delivery. Hence, to be effective, a CFM must not only be adapted to the communication preferences of affected communities, but also include procedures for recording, investigating, acting on, and providing feedback on complaints in a safe, timely and dignified manner. This also includes systems to refer complaints and feedback to ensure that the right actor with the right capacity responds. As such, the collective capacity of the humanitarian response to act on complaints and feedback mechanisms is a critical aspect of the performance of CFMs.

The availability of CFMs is also critical to their efficiency, and hence the accountability of the organisation which operates them (and the overall response they support). That is, for CFMs to be effective, populations in the areas they are targeting must be both aware of them and their utility. Lower levels of awareness about CFMs or lack of trust in their ability to perform, including the humanitarian response's ability to collectively work with referring feedback and complaints thus means lower levels of AAP, both for individual organisations and the humanitarian response.

This briefing note on 'Complaints and Feedback Mechanisms' in Lebanon, compiles recent sources and consultations, to provide an overview of the operational CFM landscape from the perspective of humanitarian staff and affected women, girls, men and boys, and aims to identify gaps and provide recommendations.


Analysis of the Complaints and Feedback Mechanism Mapping

This section presents an overview of the data gathered from the cross-framework Inter-Agency Complaint and Feedback Mapping 2022 as reported by humanitarian organizations and the Inter-Agency Service Mapping which both capture data on the availability, coverage and to an extent functioning of CFMs in Lebanon.3

Availability

Of the 84 humanitarian organizations (38 INGO, 36 NGO, 10 UN agencies) who participated in the mapping, 90% report to have a functioning complaint and feedback mechanism which covers their different sectors and geographical areas of work.

The map below outlines at a district level the prevalence of complaint and feedback mechanisms in proportion to the number of services provided across sectors. This information is drawn from the Inter-Agency Service Mapping.

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3 The Inter-Agency Complaint & Feedback Mapping was a joint effort between the Lebanon Inter-Agency, OCHA and the Inter-Agency PSEA Network.
% of services with existing CFM's in place

(Lebanon Inter-Agency Service Mapping; June 2023)
Inclusion and reach

Positively, there has been notable diversification in the number of communication channels which persons of concern can use to provide complaints and feedback from 2020 to 2022. The average number of channels being used by organisations with CFM is 7, with 14 organizations using up to 9 different communication channels.

The below graph demonstrates those communication channels which are used by organisations to receive complaint and feedback. Hotlines and Whatsapp are the most common channels used by all organization types, while UN agencies rely to a greater extent on email, NNGO on complaint boxes and INGO on in-person focus group discussions (FGD). 70% of humanitarian organizations report consulting with affected women, men, girls and boys in the design of their communication channels which indicates that efforts are being made to enhance the accessibility of such channels up from 41% in 2020. 92% of organizations report providing information in multiple formats, nearly
half of organizations are confident that persons with physical disabilities can access their CFM but this drops to nearly a quarter for persons with sensory disabilities. Up to 83% of organizations say they analyze complaint and feedback trends they capture through their communication channels to inform and adjust their programs.

PSEA capacities

PSEA capacities vary across organizations. All agencies with a CFM should be able to safely and sensitively respond to cases of SEA and child safeguarding concerns received through their communication channels. To this end, 92% of organizations reported that their staff managing CFM are trained on the Inter-Agency SOP on PSEA and know how to handle sensitive information.4 90% say that their CFM is well designed to identify and respond to SEA. 70% of INGO and 84% NNGO report having a PSEA focal point. 80% of organizations self-report having a child-friendly CFM that suits girls and boys of all ages, however in practice child-friendly CFMs are challenging to design and an area where further capacities across organizations are required.

Perceptions of Affected Women, Girls, Men and Boys (analysis from VASYR and MSNA on complaint and feedback mechanisms).

Aligning communication channels to community needs and preferences.

While most households indicate face-to-face communication overall, whether at home, at the agency office, or other venue, as their preferred method for submitting a complaint and feedback,5 the primary channels set up by humanitarian actors to receive complaints and feedback hotlines (87%), complaints and suggestion boxes (78%), WhatsApp (76%) and email (74%) remain. For Syrian refugees however, a large proportion (63%) do still prefer to provide feedback by phone.

Although these modes of communication are followed by face-to-face methods of communicating, (approximately 71% of

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4 Inter-Agency SOP on PSEA, PSEA Network 2022
5 MSNA and VASyR 2022. Households could cite more than one preferred method
organizations have these in place by way of focus group discussions), the overall finding suggests humanitarian actors can increase their efforts to provide face to face engagement at home with an aid worker. More broadly the finding suggests that although there has been an increase in agencies consulting the community when designing their CFM (70% compared to 41% in 2020), organisations need to strengthen their consultation with affected women, girls, men and boys of different age and disability groups when designing their channels.

Interestingly, when responding to complaint and feedback received by affected communities, organizations appear to prioritize in person communication to a greater extent. The top three channels organization use to respond to complaint and feedback are by phone (87%), in person meeting (83%) and WhatsApp (42%) while Syrian refugees cite they prefer to receive a response by phone (80%) and SMSs (86%) with a smaller proportion (28%) through WhatsApp.

Although there does not appear to be a notable difference in communication preferences based on the gender of the head of household or disability status of household members, it is important to note that access to some communication methods is less available for females emphasizing the need for age, gender and disability consultations when designing CFM channels. 90% of Syrian refugee households reported that a member of the household had a smartphone. However, this was much lower for female headed households compared to their male counterparts (78% versus 92% male headed households). Around three quarters (73%) of households has access to internet at home (i.e. wifi), but this was also lower among female headed households (62% compared to 76% among male headed households).

Almost all households (93%) were active on WhatsApp, a little less than a third (29%) were on Facebook, and small proportions on TikTok (4%) and Instagram (2%). There were also differences noted here based on the gender of the head of household, with a higher proportion of female headed households (18%) reporting not using any social media platforms, compared to males (4%).

**Adapt efforts to enhance knowledge about complaints and feedback.**

While significant steps are already being taken to improve information and outreach efforts with regards to enhancing community consultation, developing more inclusive CFMs and providing awareness sessions, the findings from the 2022 MSNA indicate there is a need to increase collective outreach efforts about how to submit feedback and complaints particularly for Lebanese, migrant and Palestinian refugees from Lebanon (PRL). 50% Lebanese, 37% PRL and only 25% of migrants compared to 74% Syrian refugees now know how to file a complaint and feedback with extremely low numbers in rural areas such as Akkar and El Nabatieh. Short-term project-based communication channels can further hinder knowledge about CFM communication channels.

The below graph indicates that the knowledge of how to file a complaint or provide feedback on a humanitarian program within the Lebanese, PRL and migrant community is highest in Baalbeck El Hermel, the South and Nabatieh respectively, and the lowest rate of knowledge for Lebanese households is in the North, while PRL and Migrants had no knowledge at all in Bekaa and Nabaiteh, Akkar and Baalbeck El Hermel respectively. Partners need to improve outreach on CFM in these governorates.
Meanwhile, the VASyR 2022 indicates that humanitarian actors have made positive strides informng Syrian refugee households about how to provide complaint and feedback and should continue these efforts as well as continue to adapt the means and format with which they reach the most at risk. Three quarters (74%) of Syrian refugee households reported that they knew how to file a complaint or provide feedback on a staff member or a humanitarian program and 27% of those reported that they had used a complaint and feedback mechanism for this purpose in the past six months. The rates of knowledge were lowest in El Nabatieh (63%) and highest in Akkar and Beirut (82%) demonstrating little variation between urban and rural areas. Positively, 86% of households who received assistance reported that the agency explained how to provide feedback when they received the assistance, with this reaching 94% in the Bekaa and 90% in Beirut with the lowest rate in Baalbeck el Hermel at 71%.

Overall Syrian refugees, according to the data knowledge of CFM did not differ notably based on gender of the head of household, disability presence in the household, or shelter type. However, for Lebanese, Migrants and PRL we see that households with at least one member with disabilities have less knowledge about CFM than those without. This is significant within the migrant population with a 72% difference, and similarly for migrant households which are female headed there is a 82% difference, while for Lebanese and PRL female headed households appear to have better knowledge over their male headed households.
Overall, 84% of Syrian refugees did not face any challenges accessing a complaint and feedback channel, while 12% stated that they did not know how or where to provide a complaint or feedback. Other challenges faced included not able to reach the relevant channel due to transportation costs (3%) and lack of trust that there would be an adequate response (3%).

**Act on feedback and complaints more efficiently and address barriers**

**Main reasons for not wanting to use CFM to provide feedback about received aid**  
(MSNA 2022; VASyR 2022)

- Complaints do not result in a positive change  
  (Lack of trust there will be an adequate response)

- Judgement by family and/or community  
  (Concern of discrimination and harassment)

- Worry that negative feedback would affect future aid  
  (Concern I will lose my assistance)

- Lack of confidentiality data protection  
  (Concern my information will be confidential)

- Lack of transparency in the process  
  (Don’t know how to provide a complaint or feedback)

CFMs play a critical role in ensuring the efficiency and accountability of the humanitarian response to the people we serve. That information collected through CFMs is properly acted and followed up on is vital. More efforts need to be made in this regard. For example, while 83% of all organizations that participated in the 2022 CFM mapping indicated that they analyze complaint and feedback trends to inform programming and advocacy, 32% of the households that participated in the 2022 MSNA indicated that they did not feel comfortable using CFMs due to the lack of positive change seen as a result, while 3% across population groups reported lack of trust that there would be an adequate response as a reason for not submitting a complaint or feedback. Interestingly, lack of trust that there will be a positive change in response to a complaint and feedback was higher for households with at least one person with disabilities across population groups. Further, these households within the PRL community also lack trust that their information will be kept confidential and are more concerned about discrimination and harassment if they report. Retribution through loss of assistance for reporting a complaint and feedback was markedly higher for the migrant community.
Although several additional factors regarding humanitarian organizations capacity to respond may be considered here, the compared results are still indicative of a limited capacity to close the ‘feedback loop’ and keep complainants updated throughout the process.

87% of Syrian households, 50% Lebanese, 62% PRL and 52% migrants were satisfied with aid worker behavior. When reviewing reasons for dissatisfaction with humanitarian aid actor's behavior, the main concern is lack of trust that any changes will result as a result of talking to them. These numbers are further strengthened by the low number of households reporting that they have used a complaint and feedback mechanism in the MSNA 2022.

The highest reporting of dissatisfaction with aid worker behavior in the 2022 MSNA was in the North Governorate by the PRL population with 64% reporting dissatisfaction and the lowest is by the migrant population in Nabatieh with a rate of 2%. From the VASyR 2022, it is found that the lowest reporting on dissatisfaction for Syrian's was in Baalbek Hermel with 0.7%, and highest dissatisfaction in South Lebanon.

Recommendations

For Lebanon Response Decision Makers

• Recognizing that a high proportion (83%) of organizations analyze their complaint and feedback trends, ensure that this contributes to response-wide analysis to inform strategic and operational priorities.

• Support the development of flexible policies around information sharing to guide collective actions to ensure a systematic programmatic response to the people who give the feedback at local and national levels, between NNGOs, partners, and sectors. Ensure that any new policy related to AAP in general and CFM in specific can be implemented by the different organizations and specifically by the local NGOs that have limited technical capacity.
For Donors

- Prioritize funding for sustained and organization-wide CFM rather than ‘project-based’ AAP requirements with limited funding and resources. These are less likely to be sustainable or based on proper participation and consultation and risk creating confusion for affected populations regarding where and how to report.

For Humanitarian Actors

- UN agencies, INGO/NNGO should develop organization-wide CFM with diverse communication channels and avoid project/program or geographic specific communication channels which are short-term and unsustainable.
- Ensure that all CFMs can safely receive SEA complaints and that all staff working and managing CFMs are adequately trained on the Inter-Agency PSEA SOPs and relevant referral pathways. Further, all agencies should be engaged in disseminating IEC materials on SEA and assign a PSEA focal point to actively participate in the PSEA network.
- Strengthen the consultation with different age, gender, and disability groups on the design of CFM communication channels to ensure they are inclusive and that outreach about CFMs is adequately tailored to their needs, including in a variety of languages, this includes the design of child-friendly CFM channels.
- Enhance outreach efforts about how to file a complaint and feedback with particular attention paid to services being provided to Lebanese, migrants and PRL communities who reported low awareness of the availability of CFM. In turn, build trust through increased response to CFM to address reporting hesitancy across all population groups.