

Mülteci  
Hakları  
Merkezi

Refugee  
Rights  
Turkey

## Refugee Rights Turkey

### Feedback and Complaints Policy

**Approver:** Ethics and Compliance Manager - Deputy Director

**Effective Date:** 1 September 2022

**Revision Date:** 1 August 2023

**MÜLTECİ HAKLARI MERKEZİ – REFUGEE RIGHTS TURKEY**

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## **RRT FEEDBACK and COMPLAINTS POLICY**

### **1. PRINCIPLES**

Refugee Rights Turkey (“RRT”) is committed to receiving feedback and responding to complaints about its work and conduct from all stakeholders in a timely and appropriate manner. Feedback and complaints will be dealt with professionally, and in ways that promote fairness, transparency, and accountability. RRT recognizes the importance of doing so to:

- reaffirm the dignity and value of our stakeholders and their right to be heard and acknowledged,
- learn from our stakeholders and adjust our programs to better meet their needs, thereby improving program quality and impact,
- alert the organization to serious issues for redress and to assure stakeholders that Refugee Rights Turkey does not tolerate wrongdoing.

This “Feedback and Complaints Policy” document is intended to address complaints received from stakeholders such as RRT’s beneficiaries (mostly asylum seekers, refugees, and migrants but also Turkish lawyers or legal practitioners who attend RRT’s seminars, trainings and all other persons who benefit from RRT’s direct legal assistance, trainings and other activities) partner organizations, and others that have a stake in the mission of the organization. The internal complaint mechanism governing the rules, procedures, and sanctions of RRT staff is regulated through the RRT discipline mechanism and is communicated to all staff members in the work contract.

This document should be read in conjunction with:

1. Refugee Rights Turkey’s (RRT) statute, laying down its work and activities and workplace internal directives,
2. RRT’s Code of Conduct,
3. RRT’s Anti-Corruption and Conflict of Interest Policy,
4. RRT’s Child Safeguarding Policy,
5. RRT’s Prevention of Sexual Exploitation and Abuse Policy,
6. RRT’s Personal Data Protection and Processing Policy,
7. RRT’s Internal Complaints Policy,
8. RRT’s Guideline for the Investigation of Reports of Suspected Misconducts.

### **2. STANDARDS**

RRT is accountable to the following standards in its operations:

- Relevant Turkish laws and policies including Turkish Civil Code, Turkish Penal Code and Turkish Labor Law among others.
- UNHCR Accountability to Affected Population Task Force Policy Documents (<https://emergency.unhcr.org/entry/42554/accountability-to-affected-people-aap>, <https://www.3rpsyriacrisis.org/>)

- Inter-Agency Standing Committee Accountability Framework (<https://interagencystandingcommittee.org/iasc-task-force-2-accountability-affected-people> )
- SPHERE Core Humanitarian Standards (<https://spherestandards.org/humanitarian-standards/core-humanitarian-standard/> )
- Core Humanitarian Standards (<https://www.chsalliance.org>)

Along with these set of standards that RRT benefitted mostly while preparing this document, RRT implements the following internal policies and procedures in its activities. RRT Feedback and Complaints Policy is applied in violation of the principles in these policy documents and the “RRT Guideline for the Investigation of Reports of Suspected Misconducts” procedure is applied in case it is necessary to investigate.

### 3. IMPORTANCE OF FCMs

Feedback and Complaints Mechanisms (FCMs) are essential for RRT to fulfill the organization's goals, uphold its values, and honor its commitments. When effectively implemented, FCMs serve the following purposes:

- **Addressing Power Imbalances and Ensuring Accountability:** By providing opportunities for participation and influence in decision-making, FCMs initiate the process of rectifying power imbalances and promote accountability to the individuals and communities we work with, regardless of age, gender, or ability.
- **Ensuring Relevance and Appropriateness:** FCMs enable RRT to identify evolving needs and inappropriate activities, allowing to take prompt and appropriate action to ensure that interventions remain relevant and responsive to the needs and aspirations of the participants.
- **Respecting Affected Communities and Ensuring Safety:** By identifying activities or behaviors that may cause harm, FCMs enable RRT to take necessary action to ensure the well-being and safety of the communities served. This process ensures that interventions are implemented in a manner that respects and protects the communities.
- **Building and Maintaining Trust:** FCMs facilitate the establishment and maintenance of trust between RRT and community members. By fostering a solid relationship, FCMs enhance the implementation of interventions and pave the way for deeper engagement in the future.
- **Identifying and Addressing Sexual Harassment, Exploitation, and Abuse:** Acting as an early warning system, FCMs help identify actual and potential cases of sexual exploitation, abuse and any other misconduct. This allows RRT to respond promptly, prevent further misconduct, and address other sensitive issues effectively.

In summary, FCMs are a vital component of RRT's work, enabling us to listen, learn, adapt, and ensure that RRT's interventions are accountable, inclusive, and impactful.

#### **4. WHO MAY COMPLAIN?**

All beneficiaries who receive support from the Refugee Rights Turkey can apply to RRT's Feedback and Complaints mechanism. All stakeholders who participate in the activities of RRT and in contact with the organization can apply to Feedback and Complaints mechanism if they are exposed to or observe or those who doubt a situation contrary to the Ethics and Professional principles or to communicate their negative or positive feedback for the services, they receive from RRT.

- All RRT Beneficiaries,
- Other people directly affected by policies and actions of RRT,
- Partners, donor organizations and their staff (humanitarian partners, contractors, and authorities).

#### **5. SUBJECT OF COMPLAINTS**

All types of feedback and suggestion as well as all types of complaints are received by FCM. However, legal assistance and information requests by beneficiaries and other similar requests and inquiries especially related with direct legal assistance; or inquiries from academics, researchers or journalists are not processed by the FCM, instead relevant communication channels are shared without any internal referral.

The following categories of feedback, suggestions and/or complaints will be evaluated:

- Negative /positive feedback about services,
- Operational complaints (such as delay in transactions),
- Corruption (fraud, theft, and other forms of dishonesty),
- Breaches of confidentiality,
- Sexual exploitation and abuse,
- Discrimination,
- Harassment, bullying and verbal abuse.

The Feedback and Complaints mechanism is a mechanism where all beneficiaries and stakeholders share their positive and negative feedback about the legal support services offered by the Refugee Rights Turkey, the events it organizes and all its activities, and it is also an institutional structure that can be applied in case of violation of the Code of Conduct. RRT is firmly dedicated to transparency and accountability principles and believes that receiving feedback and responding to complaints will further strengthen the support services provided to beneficiaries.

#### **6. SAFE REFERRAL**

Refugee Rights Turkey is not responsible to process, assess or investigate complaints and feedback concerning other programs, commitments and conducts not related to RRT's services or staff. However, for complaints related to the safety and protection of beneficiaries and beneficiary communities, Refugee Rights Turkey will ensure that the complainant is provided

necessary information about an agency that is qualified to assist or assisted to access this agency, as per RRT's service policies. In cases where the beneficiary needs to apply to legal authorities, legal aid referral and counseling will be provided in line with RRT's service policy.

## **7. COMPLAINT PROCEDURE**

Stakeholders have the right to provide feedback or complain in writing, verbally or by phone directly to the RRRT office, to an RRT staff member of their choice or through local leadership, or other stakeholders e.g., partners or NGOs. Complaints and feedback can be provided through both formal and informal means.

Feedbacks, thoughts, suggestions, or complaints via any of the communication channels including RRT's hotlines, phone numbers, e-mail addresses, online forms, office boxes. All feedback and complaints received are directed to RRT's Feedback and Complaints Mechanism. To ensure a timely and smooth communication, however, RRT wishes to encourage all stakeholders to use the following dedicated channels:

RRT's Feedback and Complaints Hotline: +90 0543 329 61 90

The Hotline is operational during all weekdays from 10.00 AM to 5.00 PM.

The Hotline currently operates in Turkish and English. Interpretation is provided upon request.

SMS, WhatsApp, Telegram, Signal, Viber calls and messages in any language are also accepted.

E-mail: [geribildirim-sikayet@mhd.org.tr](mailto:geribildirim-sikayet@mhd.org.tr) or [feedback-complaints@mhd.org.tr](mailto:feedback-complaints@mhd.org.tr).

E-mails in any language is accepted and duly processed.

Online form: Online forms are also available in [Turkish](#), [English](#), [French](#), [Arabic](#) and [Farsi](#).

Feedbacks and complaints shared via filling these online forms are automatically referred to e-mail addresses.

Boxes: Complaints and Feedback boxes in certain parts of the office.

## **8. STAFF OBLIGATION TO INFORM STAKEHOLDERS OF THEIR RIGHT TO COMPLAIN**

Beneficiaries will be communicated their right to provide feedback and make a complaint and the procedures for doing so during their first interaction with RRT. Other stakeholders including local leaders, relevant communities, other NGOs working in the area will be informed by RRT staff and asked to cascade the knowledge to others. Staff receive regular and refreshing training on how to provide this information.

RRT Information Form that includes information on RRT Ethics and Professionalism Principles and FCM is distributed to beneficiaries in five languages via WhatsApp. This form serves to inform them about RRT's Ethics and Professionalism Principles, as well as our Feedback and Complaints Mechanism. It is shared with clients who reach out to us through front office calls, the detention helpdesk, and the RRT Helpdesk for Unaccompanied Minors. The form is provided to them during

their initial interaction, follow-up interactions and after the closure of their cases and the purpose of the forms and FCM are explained to beneficiaries.

## **9. FEEDBACK AND COMPLAINTS PROCEDURE AND PUBLIC AWARENESS**

Feedback and complaints can be received verbally or in written form. It is expected that the individuals directly communicate their feedback and complaints to RRT, without any intermediaries, to also enable RRT Senior Management Team to be able to fully investigate the basis of the complaint.

Direct access to the complaint mechanism is advertised. A separate e-mail address has been set up to receive complaints via e-mail and safe pathways have been introduced to safeguard the confidentiality of the information shared through feedback and complaints.

At RRT offices where beneficiaries and staff are present, RRT maintains visible information on the complaint procedure in an easy-to-read format both in Turkish and common beneficiary languages. The information includes an email address and a dedicated mobile phone number to which complaints can be submitted. The complaint communication channels are posted on the website. Complainants can also directly approach RRT reception officers or request to speak to a senior officer.

RRT's Ethics and Compliance Manager is in charge of regularly checking and responding any inquiries received via Feedback and Complaint Mechanism channels. It is Ethics and Compliance Manager's responsibility to receive applications and make first assessment. In case it is understood that the application is related with a serious misconduct (violence, sexual abuse, sexual exploitation, fraud, or corruption) the Senior Manager responsible should be immediately alerted and investigation is carried out according to the RRT's Guideline for the Investigation of Reports of Suspected Misconducts.

RRT's Feedback and Complaints Mechanism is committed to respond to all applications within 3 workdays. This response includes a confirmation of the receipt of the application and what type of procedure will be followed in case of a breach of the Code of Conduct. In case an investigation is required, the process should be finalized in 1 month time. In case it is understood that the process will take more time, all parties should be informed duly.

If the complaint is a feedback/complaint about organizational deficiencies/problems rather than serious misconduct, the FCM focal person evaluates the issue with the unit supervisors. According to the decision taken, the complainant will be contacted back by the FCM Focal person and/or the relevant unit. Feedback is given to the file officer and/or the team by the unit supervisors.

The Ethics and Compliance Manager analyzes the root-cause of the complaints received at quarterly intervals and submits process improvement suggestions regarding the support provided to the Senior Management Team. This analysis serves as a learning feedback mechanism and is presented to the Senior Management Team. By analyzing the root causes, RRT aims to identify areas for improvement and implement necessary measures to address the issues raised.

Complainants have the right to remain anonymous, however complaints need to contain enough details for investigations to be conducted. Investigations of anonymous complaints may be limited by inadequate information. All feedback and complaints are to be received in an open and respectful manner. Staff must listen, accept the feedback/complaint, and be courteous and respectful. If the feedback is relevant, staff needs to demonstrate commitment to pass on feedback or resolving the complaint. If the feedback or complaint is not related to Refugee Rights Turkey's programs, commitments or conduct, the stakeholder can be politely redirected to the relevant organization or agencies depending on the nature of the complaint. Where possible, complaints will be resolved at the time. In the case of feedback, the stakeholder will be asked if they require a response. If not, a commitment will be made to pass on feedback.

For all complaints, and feedback requiring a response, a commitment will be made to do so as soon as possible, to a maximum of one month. Stakeholders should be encouraged to propose possible solutions for consideration when they submit their complaints. No promises will be made to create false expectations.

Ethics and Compliance Manager maintains a database to record all feedback and complaints received, as well as the corresponding actions taken.

## **10. CONFIDENTIALITY**

All complaints must be handled confidentially and will not impact the beneficiary's ability to receive or continue to receive services from RRT. The principle of confidentiality needs to be made clear to all RRT staff handling complaints and complainants. The protection of the complainant from intimidation or abuse of any form as far as is within the control of the people to whom the complaint is made should be ensured.

Feedback and complaints records should be treated as a security item to safeguard sensitive information, upholding the principle of confidentiality.

## **11. MONITORING**

Ethics and Compliance Manager is responsible under the supervision of a senior manager for ensuring that all complaints received are handled according to RRT Feedback and Complaints Policy.

## **12. APPLICATION OF THE POLICY**

### **12.1. Staff Responsibility**

All staff members are obligated to report any wrongful acts or suspected wrongful acts in alignment with the RRT Internal Complaints Policy. To facilitate the reporting process, the communication channels specified in the policy must be utilized for submitting reports. These reports will be diligently assessed and investigated following the procedures outlined in the "RRT Guideline for the Investigation of Reports of Suspected Misconducts" document.

No-one who reports in good faith any facts or activities through these channels will be the target of reprisals nor will they suffer any other adverse consequence as a result. RRT considers knowingly making a false report to constitute a violation of this policy. Doing so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with RRT.

### **12.2. The Role of Ethics and Compliance Manager**

The responsibilities of Ethics and Compliance Manager include promoting the awareness and application of this Code, developing, and disseminating the procedures developed by it, and assisting anyone who wants to use this mechanism in resolving any doubts in its interpretation. You must cooperate with Compliance and use it to help you apply the Code.

### **12.3. Review**

RRT will review RRT's Feedback and Complaints Policy annually with respect to legal and regulatory developments and to ensure compliance and best practice. This policy document is reviewed each June of the year by Ethics and Compliance Manager and approved by RRT Management. Staff is notified of the changes via e-mail. During the meetings held regularly by the Ethics and Compliance Manager with the staff, information about the policy document is provided and questions about the content are answered. RRT reserves the right to make changes to the document when it deems necessary, without waiting for the annual review.

## **13. REFERENCE DOCUMENTS**

This policy document is fully in compliance with relevant national legislation as well as key international legislation. RRT was inspired by and benefitted from following key guiding documents, statements, and standards, and make the utmost effort to fully comply with principles set forth. As of the date of review of this policy document, this policy is fully compliant with the following:

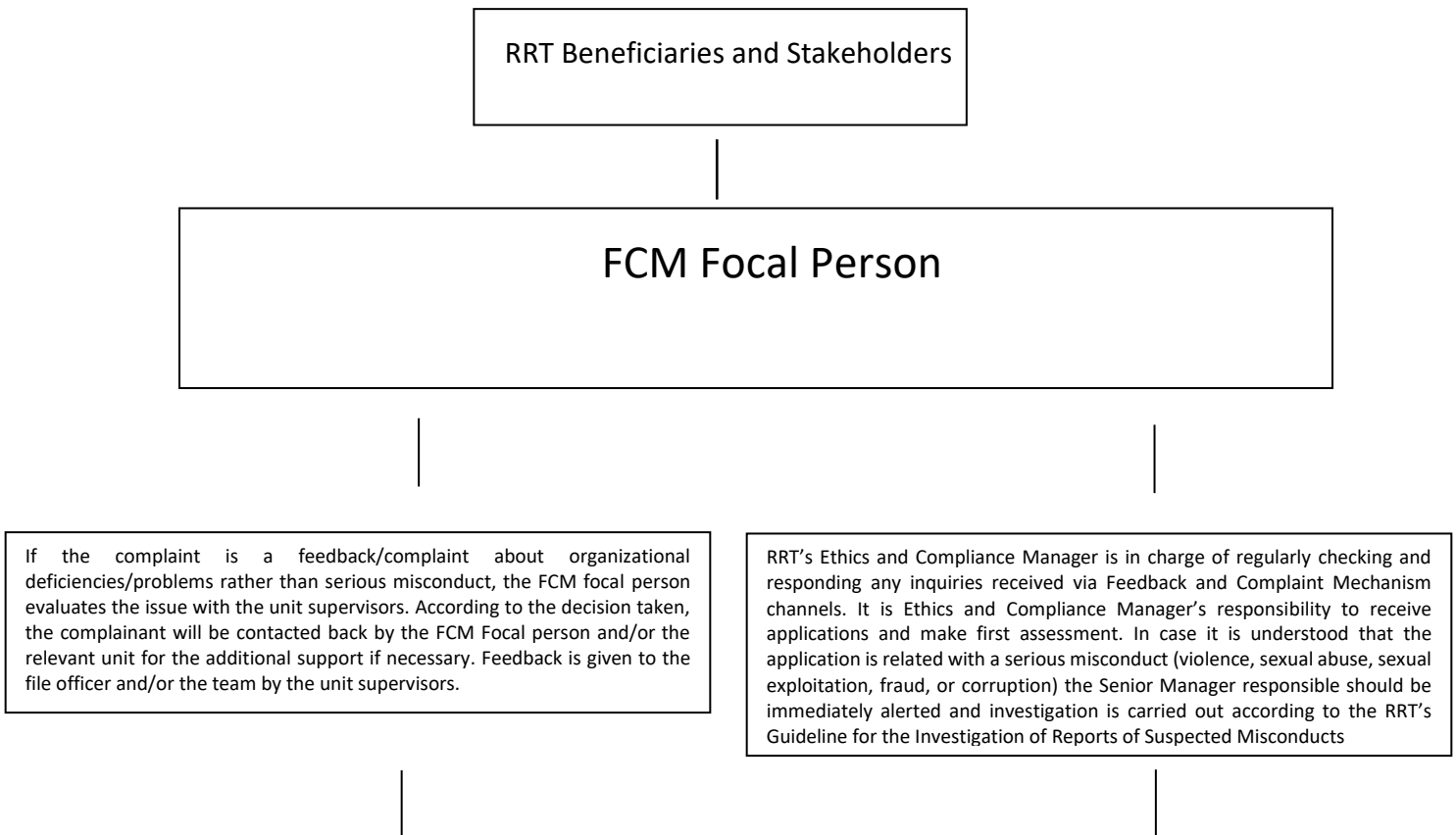
- Relevant Turkish laws and policies including Turkish Constitution, Turkish Civil Law (Law No. 4721), Turkish Labor Law (Law No. 4857) and Turkish Penal Code (Law No. 5237).
- IASC, IASC Commitments on Accountability to Affected People and Protection from Sexual exploitation and Abuse, 2017, available at: [https://interagencystandingcommittee.org/system/files/iasc\\_caap\\_endorsed\\_nov\\_2017.pdf](https://interagencystandingcommittee.org/system/files/iasc_caap_endorsed_nov_2017.pdf)
- IASC, Protection from Sexual Exploitation and Abuse (PSEA); Inter-agency cooperation in community-based complaint mechanisms, 2016, available at: <https://fscluster.org/document/iasc-psea-inter-agency-cooperation>
- CHS Alliance, Groupe URD & Sphere Project, Core Humanitarian Standards on Quality and Accountability, 2014, available at: <https://corehumanitarianstandard.org/files/files/Core%20Humanitarian%20Standard%20-%20English.pdf>



- IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019, available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2019>
- United Nations Secretary General’s Bulletin- Special measures for protection from sexual exploitation and sexual abuse, available at: <https://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>
- UNHCR, Operational Guidance on Accountability to Affected People (AAP), 2020, available at: <https://www.unhcr.org/handbooks/aap/>

**Appendix A:**

**RRT Feedback and Complaints Mechanism Organizational Chart**



**Unit Coordinators**  
**Detention Unit**  
**Temporary Protection Unit**  
**International Protection Unit**  
**Child Protection Unit**

**Deputy Director**

Feedback is given to staff by responsible Unit Coordinator.

Investigation is carried out according to the RRT's Guideline for the Investigation of Reports of Suspected Misconducts and report is presented to the responsible Deputy Director.



The Ethics and Compliance Manager analyzes the root-cause of the complaints received at quarterly intervals and submits process improvement suggestions regarding the support provided to the Senior Management Team. This analysis serves as a learning feedback mechanism and is presented to the Senior Management Team. By analyzing the root causes, RRT aims to identify areas for improvement and implement necessary measures to address the issues raised.