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Guidelines on Complaint Procedure Mechanism

Complaint Procedure Mechanism

Guidelines for hotlines on establishing and maintaining Complaint Procedure Mechanism

The purpose of this document is to provide hotlines with non-binding guidelines on how to establish and maintain an effective Complaint's Procedure Mechanism for hotline services. This mechanism will ensure that complaints from users or stakeholders are addressed promptly, fairly, and transparently, leading to continuous improvement in service delivery and stakeholder satisfaction.



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Background information

Hotlines might receive complaints for various reasons such as misunderstandings, dissatisfaction with the services received, or issues handling specific cases. Therefore, hotline services need to have a mechanism in place to address and resolve complaints fairly and efficiently. The complaint mechanism is not only necessary for addressing users' concerns but also for providing the best possible services.

A well-functioning complaint mechanism allows hotlines to address shortcomings and identify areas for improvement to enhance the overall quality of their services. Complaints provide valuable insights into the experiences of hotline users. By promptly addressing and resolving complaints, the hotlines can demonstrate their commitment to users' satisfaction. Effective complaint handling can help to rebuild trust, maintain positive relationships with users, and ensure their ongoing satisfaction with the services provided.

Hotline services often work closely with various stakeholders, including government agencies, non-profit organisations, and the public. All hotlines operate within their national legal frameworks and most of the hotlines adhere to EU standards and guidelines. A transparent and effective complaint mechanism instils confidence in these stakeholders by demonstrating the hotline's commitment to accountability and continuous improvement. A well-structured complaint mechanism ensures compliance with relevant regulations and demonstrates a commitment to best practices in complaint handling.

The purpose of the guide is to provide clear steps for a hotline to set up a complaint mechanism procedure. This mechanism will ensure that complaints from users or stakeholders are addressed promptly, fairly, and transparently, leading to continuous improvement in service delivery and stakeholder satisfaction.

Internet Watch Foundation (IWF) has already implemented a Complaints Procedure Mechanism and has successfully launched their policy, making it possible for the public to complain about their available services online. The efforts of IWF in implementing and promoting their Complaints Procedure Mechanism reflect their commitment to providing excellent services, maintaining their reputation, and ensuring user satisfaction. IWF agreed to share their practices and procedures with the aim of fostering collaboration and improving the overall effectiveness of hotline services in the whole network. Through this sharing of knowledge and expertise, hotlines can collectively enhance their services, refine their complaint handling procedures, and improve overall user experiences.

“Complaint Reporting Mechanism” implementation

Establishing Complaints Handling Policy

The establishment of a Complaints Handling Policy is a crucial first step for organisations to effectively address and manage customer complaints. The policy should set guidelines, procedures, and responsibilities for handling complaints in a consistent and fair manner. It should outline the process from receiving to resolving a complaint with emphasis on timely replies and appropriate actions. The Complaints Handling Policy must serve as a framework to ensure transparency, accountability, and users' satisfaction. The policy's extent can encompass the various categories of complaints that hotlines regularly encounter. For instance, in the case of the IWF, the policy can incorporate two types of complaints concerning the hotline services directed towards users: content assessment and general complaints. Complaints about the content assessment process enable users to file complaints if they have concerns or issues with how the hotline assessed or handled certain type of content. General complaints provides users with the option to file complaints if they experience unsatisfactory behaviour from hotline staff or if they are dissatisfied with the overall services offered by the hotline. Establishing the policy requires considering three pillars in the policy implementation phase: the scope of the policy definition; types of complaints; and the channels through which complaints can be submitted.

The process of handling complaints

To establish an effective complaint handling mechanism, it is essential to follow a systematic procedure to ensure the processes are timely and high standards are maintained. The implementation of the complaint procedure requires allocating adequate human resources. The roles and responsibilities should be clearly defined during the establishment of the complaint mechanism.

Assigning Responsibility

Hotlines must designate a specific team or at least two individuals responsible for handling complaints. It is important to define the hierarchy of complaint resolution and the role of the team members in solving it. This practice fosters an open and accountable process by involving multiple individuals in the evaluation of complaints, thereby minimizing the potential for biases or personal interests to influence the outcome.

Tip: To ensure transparency and mitigate conflicts of interest, it is recommended that complaints be received and reviewed by a minimum of two to three staff members.

The hierarchical structure for complaint resolution within a hotline may typically involve three key staff members: the focal point responsible for receiving complaints, the HR Manager, and the Hotline Manager.

- **The focal point** serves as the initial point of contact for receiving and documenting complaints from users or individuals seeking assistance. Their role involves gathering relevant information, ensuring proper documentation, and initiating the complaint resolution process.
- **The HR Manager** plays a crucial role in complaint resolution by overseeing the overall management of human resources within the hotline. They may be responsible for conducting investigations, coordinating with relevant parties involved, and ensuring that appropriate policies and procedures are followed throughout the resolution process.
- **The Hotline Manager** holds a supervisory position and is responsible for the overall operations and effectiveness of the hotline. They may have oversight over complaint resolution activities, including monitoring the progress of complaints, providing guidance to the focal point and HR Manager, and ensuring adherence to established protocols and quality standards.

Tip: When determining specific roles and responsibilities assigned to these positions, consider the capacity, resources available, unique characteristics, and structure of your hotline.

Hotlines need to make sure that all involved staff have the necessary training and resources to handle complaints effectively.

Establishing Channels of Communication

Handling complaints requires an effective communications channel and therefore it is important to establish clear channels for receiving and tracking complaints. The system provided for reporting complaints should be inclusive, allowing all potential complainants to express their grievances.

Hotlines need to provide (if possible) a range of ways to submit a complaint such as email addresses, online forms, helplines, SMS reporting, and online social platforms.

Despite the widespread preferred way of online reporting, there are still communities that may prefer phone messages or posts. To make the complaint procedure possible and accessible, all factors related to the specific community's needs must be considered before its launch.

The way these procedures are publicised should consider the cultural nuances and accessibility requirements specific to the country involved. It is important to make sure that users are aware of how to submit a complaint by communicating the available channels. The complaint possibilities should be visible and accessible on the hotline's websites. It should describe the nature of the complaints and the sources to access it. After the complaints are explained promptly, the access links should provide options to file the complaint.

The complaint forms can differ per the nature of the complaint. It should display 1) the type of complaint; 2) the reason for complaint; 3) the complainant's details.

In case the complaint is handled by team members, the contact details of the team member should be available on the website.

Acknowledging Users' Complaints

Once the complaints are received, it is essential to respond promptly and acknowledge the concerns raised. Active listening, attention to the matter, and empathy are crucial during this stage, as it helps to understand the underlying issues and demonstrate a genuine commitment to resolving them. Clear communication with the complainant about the steps being taken to address their concerns is equally important. Hotlines need to provide clear information about the complaint procedure on their website (see [IWF](#) as an example). It is recommended to regularly update the complainant on the progress made and any further actions being taken. By prioritising open and transparent communication, organisations can effectively handle incoming complaints and resolve issues to the satisfaction of all parties involved.

The users' complaints need to be acknowledged promptly, preferably within a defined timeframe. The acknowledgement should be confirmed based on the ways the recipient submitted the complaint. For instance, if the complaint was made on the website via the online form, confirmation email needs to be sent to the mentioned address. Complainants should be allowed to submit the complaint anonymously.

Establishing Complaint Database

To establish an organised and systematic approach to managing complaints, it is recommended to develop a comprehensive database dedicated to recording and storing complaint information. This database serves as a central place for documenting and tracking complaints throughout the resolution process. The creation of a complaint database involves the implementation of a structured system capable of efficiently and confidentially capturing and storing relevant details related to each complaint.

Tip: You can include in the database information such as the complainant's identity (If applicable), complainant's unique reference number, nature of the complaint, channel of complaint, any supporting documentation or evidence provided, date of submission, the date of complaint solved, the status of the complaint, and the satisfaction with the complaint.

The information about the date of closed/solved complaints is necessary to see how long it took to solve the issue and track the unsolved complaints. Also, including user satisfaction levels in the complaint resolution process improves the quality of procedures and aids in comprehensive reporting.

Categorising and addressing the complaints

To categorise and classify the complaints the following grades can be used: 1) suggestions/feedback 2) minor dissatisfaction 3) major dissatisfaction 4) corruption and fraud 5) sexual misconduct and discrimination. The severity of the complaints depends on the grade that is established, and appropriate actions should be taken based on these categories. Feedback/Complaints can be addressed according to their respective grade, ensuring that the complaints are

handled and reviewed by the relevant stakeholders. It is important to address the complaints with higher grades in a shorter period with high importance. To effectively address complaints with higher grades (4 and 5 in this case), it is advised to establish or assign board members to review and solve the grievance. This board should consist of individuals who possess the necessary expertise, experience, and authority to handle complex or serious complaints. Their role is to carefully review and assess such complaints, ensuring that they are thoroughly investigated and resolved in a fair and impartial manner. The inclusion of ethics or higher board members helps uphold the highest standards of integrity and accountability within the complaint resolution process. Their expertise and oversight contribute to instilling trust and confidence in the system, as well as ensuring that appropriate actions are taken to address the concerns raised.

Tip: The categorisation of the complaints can be used or adjusted based on the hotline's needs and preferences.

Privacy, Security, and Informed Consent

The dedicated database ensures the systematic documentation of complaints, enabling easy access to historical records and facilitating the retrieval of specific information when needed. It enhances transparency and accountability by providing a centralised platform for tracking the progress and status of each complaint, allowing for efficient monitoring and reporting. It also supports data analysis and trend identification, which can inform decision-making, policy development, and continuous improvement initiatives.

Tip: You can use an online Microsoft Excel spreadsheet with limited access, preferably to one staff member who will be responsible for recording the complaints and withdrawing the data for the regular reports.

To ensure the security and confidentiality of sensitive complaint data, appropriate measures should be implemented, such as access controls, encryption, and adherence to data protection regulations. It is imperative to anticipate and consider the variations in data protection regulations across different countries where hotlines operate. Prior assessment of these regulations is necessary to ensure the compliance and protection of the privacy rights of individuals. Additionally, clear communication and identification of regulations of data storage are crucial to uphold data protection standards and maintain legal compliance.

Regular backups and data integrity checks should also be performed to safeguard against potential data loss or corruption. Access to the database should be limited only to those staff members who can access the private information, since the privacy and security of the complainant should be respected/reserved. This is intended to prevent disclosure of information about the complaint which could result in data linkage to the accused or any potentially involved participants in the alleged misconduct, unless explicitly authorised by the complainant and except when mandated by law.

Some cases may require disclosure of the complainant's personal information. Obtaining informed consent is vital when it becomes necessary to share the informant's personal information with third parties to address the issue at hand. This ensures transparency and respects the individual's privacy rights while enabling effective resolution of the matter.

Communicating with the Complainant

Hotlines should keep the complainant informed about the progress of the complaint investigation and set realistic expectations regarding timelines for resolution. If there are delays or unforeseen circumstances, this should be communicated to the complainant. After resolving the complaint, it is advised to follow up with the complainant to ensure their satisfaction with the resolution. Feedback should be encouraged for handling process and used to enhance future procedures.

To keep the procedure transparent and trustworthy these additional steps are advised:

- Provide information about who and which department bears responsibility to ensure the proper management and resolution of the complaint.
- Mention clear steps of complaint procedure mechanism.
- Provide approximate timelines.
- Comply with complainant's right to stay anonymous.
- Ensure data confidentiality and privacy.

Complaint processing

After the complaint is received, confirmed, and recorded, it is important to process it. Assessment should be done objectively, considering all available information and relevant policies or regulations. Complaints need careful examination and analysis, involving fact-finding exercises to determine the appropriate course of action. It is important to gather all relevant details and supporting documents related to the complaint and conduct a thorough and impartial investigation, considering different perspectives and consulting relevant parties. It is advised to maintain clear records of the investigation process, including notes, interviews, and evidence collected.

The review process should be approached without preconceived notions or personal interests. The case should be judged based solely on the facts and evidence presented. The collaboration with the other parties involved (if needed) should maintain neutrality and avoid any conflicts of interest, ensuring fairness and justice in the proceedings.

Solving the Complaints

It is crucial for the organisation to possess a comprehensive understanding of the relevant legal framework, as well as the broader social, political, and economic context in which the complaint arises. It is advisable for the receiving organisation to directly address the complaint and take responsibility for the investigation and the solution. Additionally, understanding the nuances of the complaint is necessary to navigate the complexities associated with addressing such complaints effectively. The process of identifying and implementing effective approaches to solve the issue demands a high degree of adaptability, recognising that each complaint is unique and may require tailored solutions. Based on findings and established policies, hotlines need to determine an appropriate resolution. The resolutions should be communicated clearly and reasons for the decisions made need to be provided to the complainant. If the complaint is valid, hotlines need to offer appropriate measures or compensation to the complainant, if applicable.

In a case of disagreement with the results, the possibility to appeal must be created/provided. Complaints or decisions falling outside the scope of the complaint mechanism should be referred to the relevant entity, independent panel, organisation or individual to confirm the result or a decision of a complaint that lies beyond the complaint system scope. The appeal process must be included on the website.

Closing the complaint

Once the investigation is completed and the appropriate decision and solution are made, the case can be closed. Upon the closure of the complaint, it is important to explain the outcome and the reasons for the decisions made to the complainant. Hotlines need to provide the user with necessary information about the procedure and the outcome and express the importance of their contribution to the improvement of the services. Complainant satisfaction with the decision needs to be assessed and included in the created database.

Monitoring and Evaluation

Regular monitoring and evaluation of the complaints handling process allows hotlines to assess the mechanism's effectiveness and efficiency. Therefore, the assigned focal points need to provide a report scheduled based on the internally agreed timeline. It allows the implementation of necessary changes or improvements to prevent similar complaints from arising in the future. The database can serve as a platform to analyse complaint trends, identify recurring issues and implement measures to address them proactively. Continuous monitoring enables the timely identification of any shortcomings, allowing for prompt corrective measures. The report should be shared or presented to all relevant stakeholders defined by the organisation.