

## Accountability Framework

### Introduction:

The East Jerusalem YMCA (EJ-YMCA) defines 'Accountability' as the responsible use of power. The EJ-YMCA aims to hold itself responsible, through different means that involve all of its stakeholders, to remain faithful to its mission. Being transparent allows for feedback from stakeholders who develop a sense of ownership in its work. Maintaining a proper Accountability Framework, enhances the EJ-YMCA's performance, while eliminating potential inefficient use of resources.

Accountability is a two-way process which involves, the right to have a say and the duty to respond. Therefore, the EJ-YMCA developed its Accountability Framework based on four main areas:

1. allowing for participation of stakeholders;
2. providing an enabling environment;
3. sharing of information;
4. receiving feedback from stakeholders while setting a proper complaints and response mechanism.

The EJ-YMCA is committed to ensuring that all of its stakeholders, which include: beneficiaries, partners, staff, volunteers, donors, supporters, suppliers, etc. have the right to:

- Have an influential say in choices that impact on their lives.
- Be informed of what the organization does and how it does it, including projects, programs, activities, services and decision making-mechanisms.
- Raise complaints and provide feedback on the work the EJ-YMCA supports.
- Be protected from dishonest or harmful practices.

## **Purpose:**

By implementing accountability mechanisms, the EJ-YMCA aims to:

- Build mutual trust and respect with its stakeholders, and most importantly the communities it serves.
- Improve quality of programs and interventions.
- Strengthen its relationship with its stakeholders.
- Increase its sources of learning and advancement.

### **1. Participation**

The EJ-YMCA recognizes the vital impact of keeping its stakeholders involved in its work. Therefore, it strives to engage its beneficiary populations, staff/volunteers, partners, donors, suppliers, etc. in all stages of designing and implementing interventions and programs.

- Consult with the local community when identifying hard to reach vulnerable groups and addressing potential barriers to their participation.
- Recognize and understand the existing community structures and their representation, then work on enhancing them.
- Plan with and encourage community when and how they want to participate in all stages of designing and implementing interventions and programs.
- Monitor the quality of participation and ensure proper representation.
- Consult partners and donors on key decision-making processes such as, strategic planning, funding decisions, program evaluations, etc.
- Regularly involve staff and volunteers in planning of programs, internal evaluations, organizational practices, etc.

### **2. Information Sharing**

The following information should be available to all EJ-YMCA stakeholders, either through its formal visibility channels or upon request:

- Background and contact details of EJ-YMCA and its programs / centers.

- Vision and Mission
- Plans and Strategies
- Internal policies, mainly: the Code of Conduct, the Safeguarding Policy and Procedures, the Child Protection Policy, the Diversity / Inclusion / Equity Policy, the Sexual Exploitation and Abuse Prevention Policy, the Accountability Framework, the Anti-Corruption and Fraud Policy
- Complaints and Response Mechanism
- Summaries of evaluations
- Narrative reports
- Financial reports
- Beneficiary selection criteria and deliverables
- Organizational Structure
- Dates and locations of key events open to community participation
- How input from stakeholders' participation contributed to decision-making
- Public positions

*Note: Information should **NOT** be shared if it is determined to be too sensitive or harmful to the EJ-YMCA or its stakeholders, or if the information is likely to be misused.*

How to do it:

- Use appropriate means for information sharing which might include: meetings, local media channels, relevant consortiums, printed materials, social media platforms, field visits, etc.
- The information content, method, and language should be appropriate to the target group. It should also be clear, updated, and accurate.
- Give stakeholders the opportunity to share their feedback on what kind of information they want to know and how they want it. This can be done through surveys, direct interaction, feedback boxes, social media, etc.
- Announce channels for collecting feedback for each Program / Center as relevant.

- Monitor the process of information sharing to make sure it is effective.

### 3. Enabling Environment:

In order to allow for effective and efficient participation, the EJ-YMCA has to do the following:

- Establish an effective framework for accountability.
- Analyze stakeholders' ability to support accountability procedures.
- Identify main areas that require capacity development to improve stakeholders' participation.

### 4. Complaints and Response Mechanism<sup>1</sup>

#### A. Purpose:

- To be accountable towards all stakeholders.
- To improve the quality and efficiency of the EJ-YMCA work.
- To have a safe, accessible and effective Complaints and Response Mechanism.
- To enhance transparency.

#### B. Scope:

This framework applies to all EJ-YMCA staff, members, volunteers and other stakeholders which include partners, beneficiary populations, donors, supporters, consultants, suppliers, etc. It represents a statement for stakeholders on how to raise complaints and how these are processed.

#### C. Complaints addressed by this framework:

Incidents when any of the EJ-YMCA staff or volunteers :

- Failed to comply with their commitments and/or their obligations in the course of their work.

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<sup>1</sup> Based on the ACT Complaints Policy

- Failed to comply with or implement the principles and commitments of the EJ-YMCA's Code of Conduct.
- Failed to comply with or implement the principles and procedures of the EJ-YMCA's Safeguarding Policy and Procedures.
- Engaged in an act of sexual exploitation and abuse against a beneficiary, colleague, or any other stakeholder.
- Engaged in an act of fraud and corruption related to their work at the EJ-YMCA.
- Engaged in any act that violates children rights.

*Note: The EJ-YMCA accepts operational, behavioral and sensitive complaints; however, if the complaint received is not within the scope of the EJ-YMCA's Complaints Mechanism, the complainant will be informed about that and about possible approaches to resolve the issue.*

#### **D. Definitions:**

- **Feedback:** the EJ-YMCA makes a distinction between the terms "complaint" and "Feedback" . Feedback is any positive or negative statement of opinion about someone or something; an opinion shared for information. It may be expressed formally or informally, and may or may not require a response.
- **Complaint:** a complaint is a specific grievance linked directly to the categories outlined in section C that fall within the scope of this framework, where a response or resolution is expected by the complainant.
- **Operational complaint:** is a complaint about the implementation or the quality of operations, activities or projects run by any of the EJ-YMCA's Programs and Centers.
- **Behavioral Complaint:** a complaint about a violation of any of the articles stipulated in the EJ-YMCA's Code of Conduct, or the Diversity, Inclusion and Equity Policy.
- **Sensitive complaint:** a complaint about a violation of any of the articles stipulated in the EJ-YMCA's Anti-Corruption and Fraud Policy, Safeguarding Policy and Procedures, Child

Protection Policy, or Protection from Sexual Exploitation and Abuse Policy. These complaints may require to be handled by a technical expert.

- **Malicious Complaints:** Complaints that are filed with a malicious intent and with the intention of harming someone or the organization. The EJ-YMCA assumes that all complaints are made in good faith with no intention to harm anyone or the organization.

#### **E. General Principles:**

- **Operational and Behavioral Complaints - Confidentiality and safety:** It is important to protect the privacy and safety of the complainant, the defendant, and the witnesses if any. The complainant and the defendant are entitled to obtain the report of the Complaint Committee and a copy of his/her recorded or written testimony only, if available. As soon as the complaint is processed, all related documents are kept at the Human Resources Department. The EJ-YMCA has the right to use all data and procedures related to the complaint, while maintaining the confidentiality of the complainant and the defendant, whenever required and for the purposes of its development.
- **Sensitive Complaints - Confidentiality and safety:** all related documents and procedures, names of people involved, and records are dealt with in a confidential manner; only members of the Complaint Committee and the Investigation Committee are entitled to have access to them. The EJ-YMCA will not release any information unless required by law, or for protection needs related to the complainant upon his/her request, or in a case of clear and imminent danger to the complainant or another person. The complainant and the defendant are entitled to obtain the report of the Complaint Committee and a copy of his/her recorded or written testimony only, if available. As soon as the complaint is processed, all related documents are kept at the Human Resources Department.
- **Responsiveness:** the EJ-YMCA will proceed in processing complaints within 7-10 working days in the case of operational and behavioral complaints, and within 3 working days in the case of sensitive complaints. The complainant will be informed of the start date of the procedures as well as the expected date to receive a response. The ideal time to finalize

procedures is 60 working days. In case the complaint needs more than 60 working days, the EJ-YMCA will keep the complainant informed and updated.

- **Communication:** After informing the complainant that the EJ-YMCA has started its procedures to deal with the complaint, the complainant nor the defendant is not entitled to communicate with any of the members of the Complaint Committee or the Investigation Committee except for the purposes of submitting additional supporting documents. Additional supporting documents are only acceptable to be submitted through the assigned staff of the Human Resources Department and within three working days of being informed about the formation of the investigation committee. The complainant is also not entitled to request an appeal or communicate with the EJ-YMCA's Board of Directors, which is the body designated for appeal, before the committee's report is issued. Any communication by the complainant or the defendant with any of the committees' members or the Board of Directors prior to the issuance of the Complaint Committee's report, or making any attempt to influence them, is considered to create confusion in the workplace, and will be dealt with through the penalties stipulated in the EJ-YMCA Human Resources Manual.
- **The Defendant:** Upon the request of the General Secretary, the assigned staff of the Human Resources Department will send the complaint to the defendant to respond in writing back to the Human Resources Department within seven working days. The EJ-YMCA believes that the defendant is innocent until the investigation is completed and the Complaint Committee issues its report.
- **Accessibility:** all stakeholders are entitled to file complaints to the EJ-YMCA through any of the set channels, which include: mail, e-mail, mobile phone, SMS, by hand, etc. In addition, the EJ-YMCA facilitates submission of complaints regardless of the literacy level of the complainant, and it accepts anonymous complaints as well.
- **Transparency:** The Accountability Framework including the Complaints Mechanism will be available through the EJ-YMCA official platforms. In addition, all new staff must receive

orientation on the policy as a compulsory step before signing their contracts, through the Human Resources Department.

- **Right for all:** It is the right for all stakeholders to file a complaint. The EJ-YMCA guarantees that no complainant will be met with retaliation for filing a valid complaint. Unless it is proven that the complaint is malicious, then the complainant will be subject to disciplinary measures as set in the EJ-YMCA Human Resources Manual.
- **Objectivity:** Every complaint will be handled with objectivity and impartiality. The EJ-YMCA core values apply to this framework. Any staff member or volunteer who is found guilty, will be subject to disciplinary measures as set in the EJ-YMCA Human Resources Manual.

#### **F. How to file a complaint:**

1. Complaints may be addressed to the EJ-YMCA through mail, e-mail, mobile phone, a text message, or by hand.

**Mail:** EJ-YMCA, 82 Nablus Rd, P.O.Box 19023, East Jerusalem

**Mobile / SMS / What's App:** +970 (0) 562610016

**Website:** <http://www.ej-ymca.org/complaints>

**Email:** [complaints@ej-ymca.org](mailto:complaints@ej-ymca.org)

**By hand, addressed to:** Human Resources Department, located in Beit Sahour

2. The following process should be followed when submitting a complaint:
  - a. An EJ-YMCA Complaint Form shall be completed.
  - b. In the case whereby the complainant is unable to write, the EJ-YMCA assigned HR staff will file the form on their behalf, read it to him/her for their approval, and then submit the document on their behalf.
  - c. The format will be available in English and Arabic.
  - d. The form shall be properly filled in, and shall include all requested information, to qualify as an official complaint.



- e. Partially filled-in forms will not be considered.
  - f. Additional information (if needed) will be requested to be sent via any of the channels listed earlier.
  - g. Upon completion of the form, the assigned HR staff will read back verbatim, and send an email/mail back to the complainant with the information provided in the complaint form to ensure that it precisely reflects his/her grievance.
  - h. Upon determination that the complaint is properly filled in, the HR staff who fills in the form will sign it and date it with an assertion that this information reflects what was communicated by the complainant with no omissions or additions.
3. The complaint will then be sealed and passed on to the General Secretary to review and deal with according to the set mechanism.
  4. In case of anonymous complaints, although action may be taken, it will not be possible to give feedback directly to the complainant.

**G. Roles and Responsibilities:**

1. Sensitive, operational and behavioral complaints must be documented by the assigned staff of the Human Resources Department, and sent during the first working day of receiving them, to the General Secretary, who is the only person authorized to review the complaint and make the appropriate decision regarding approval of the complaint's classification according to the complainant's claim (operational, behavioral, sensitive, criminal, other), and processing it. If the classification of the General Secretary contradicts what was submitted by the complainant, the complaint must be reviewed by a committee consisting of the Secretary of the Board of Directors and a member of the Senior Management Team.
2. Depending on the type of the complaint, whether it is behavioral, operational, sensitive or anonymous, the General Secretary shall form a committee to follow it up.

3. The assigned staff of the Human Resources Department is the single point of contact with the complainant and the defendant, and it is his/her responsibility to keep the complainant informed of the progress of the complaint follow-up process, while ensuring not to disclose any information or documents related to the investigation without a clear and explicit request by the committee.
4. The assigned staff of the Human Resources Department shall facilitate and coordinate the work of the committee/committees, follow up all correspondence related to the complaint, document all data related to the complaint, and attend and document all investigation sessions.
5. The Complaint Committee forms the Investigation Committee, **if necessary**, and defines its roles and responsibilities.
6. The Complaint Committee and the Investigation Committee shall be the only official bodies authorized to study all documents and data, and to conduct any meetings or investigations, to obtain information regarding the complaint, whether inside or outside the EJ-YMCA.

#### H. Handling Complaints:

##### **Sensitive Complaints:**

1. **Confidentiality:** Complaints classified as sensitive complaints are handled with confidentiality. Only a very limited number of persons who need to know about the complaint will be involved in the process.
2. **Complaints Committee:** It consists of at least 3 staff; the General Secretary, a Senior Management Team member, and a Board of Directors' member (unless the complaint is against any of them).
3. **Investigation Committee:** The Complaint Committee will assign three members for the Investigation Committee to do necessary investigations as per the terms of reference set for them. Those will be chosen from other Programs/Centers as much as possible to ensure that they have no work relations with the defendant, especially in cases where the

complaint is about a gross misconduct. In cases where an external investigator is required, the Complaint Committee may contract a neutral investigator.

4. **Terms of Reference:** The Complaint Committee will set up a Terms of Reference (ToR) describing the roles and responsibilities as well as the principles to be followed during the investigation. The principles of the investigation are based on confidentiality, objectivity and strict reporting lines.
5. **Decision-Making:** The Investigation Committee will conduct the investigation in accordance with the set ToR and will report back to the Complaint Committee who shall make the final decision and inform the complainant about it.
6. **Appeal Committee:** If the complainant does not accept the outcome of the complaint, he/she can appeal the outcome to the Appeal Committee at the EJ-YMCA. The Appeal Committee consists of the President of the EJ-YMCA, and another member of the Board of Directors.

*Note: For any person/s accused of gross misconduct, or similar accusations, the EJ-YMCA will ensure that the investigation will be conducted in a manner that protects their status, should the accusation prove to be unfounded. The defendant, may however, be suspended from his/her work for the duration of the investigation.*

#### **Operational and Behavioral Complaints:**

1. If a beneficiary or a staff member submits a complaint to the Human Resources Department, the department will communicate the complaint to the General Secretary, who will send it to the Director of the relevant program / center to deal with it according to the Complaints Mechanisms set, provided that the Director is not part of the complaint. Otherwise, the General Secretary will deal with the complaint him/her-self.
2. The EJ-YMCA encourages resorting to dialogue and amicable ways for conflict resolution. Whenever this is impossible, the Director shall form a Complaint Committee following the

approval of the General Secretary. The assigned staff of the Human Resources Department shall keep the complainant informed of progress as much as possible.

3. **Complaint Committee:** It is required that the committee consists of 3 qualified staff of the EJ-YMCA.
4. Members of the Senior Management Team must be formally informed of the progress of the complaint and all results related to it.
5. **Decision-making:** following finalizing its work, the Complaint Committee shall submit its report to the General Secretary to make the appropriate decision. Then the assigned staff of the Human Resources Department informs the complainant of the decision.
6. **Appeal Committee:** If the complainant does not accept the committee's decision, he/she can appeal the decision to the General Secretary within 10 working days of receiving the decision.

#### **Anonymous complaints:**

Anonymous complaints especially those referring to sexual exploitation or fraud or any other serious violations of law, can be investigated. If sufficient documentation is gathered, then the committee proceeds, if not the committee has the right to dismiss the complaint.

#### **Malicious complaints:**

If the complainant is an EJ-YMCA staff and his/her complaint is malicious, and is verified by the Complaint Committee, the complainant will be held accountable and a disciplinary measure will be taken against him/her according to the EJ-YMCA Human Resources Manual. In this case proper measures shall be made to maintain the defendant's honor following the attempts to harm him/her.

#### **I. Keeping Records**

1. Keeping records of complaints is useful for legal protection, as well as for improving organizational practices, and staff performance.

2. Complaints must be kept in secured files that are only accessible to assigned staff of the Human Resources Department.
3. A Complaint Log should be prepared by the Human Resources Department and shared with the Senior Management Team on an annual basis, that includes the following data:
  - Name of the complainant or a code number assigned by the Human Resources Department in cases where the complainant requested to keep name hidden.
  - Date when the complaint was made.
  - How the complaint was made (email, phone, by hand, mail).
  - Description of the complaint. In case it is a sensitive complaint, the description will not include names of people involved.
  - Complaint Committee.
  - Status through to resolution.
  - Date of resolution.

**J. How to Evaluate the EJ-YMCA Complaints System:**

1. Review and evaluate the system on an annual basis.
2. Discuss the system as well as the Complaint Log annually through the EJ-YMCA Senior Management Team meetings.
3. Collect feedback from the field through monitoring visits.
4. Discuss the system with the EJ-YMCA staff and get their recommendations.

**K. Staff training:**

1. The EJ-YMCA Human Resources Department will be responsible to train and introduce all EJ-YMCA staff to this Accountability Framework and other policies especially its Code of Conduct.
2. New staff orientation on the EJ-YMCA policies, especially the Accountability Framework, Code of Conduct, and Complaints and Response Mechanism should be part of his/her recruitment process.

3. Each Program/Center will be responsible for updating its stakeholders especially its beneficiaries on the EJ-YMCA Accountability Framework, Code of Conduct, and Complaints Mechanism.

**Annexes:**

Annex 1: Complaint Form

## COMPLAINT FORM

### 1. COMPLAINANT

Full Name  
Title - Program/Center  
Address  
Mobile  
E-mail

Is there a representative making the complaint on behalf of the complainant?  YES  NO

If yes, please provide full name and contact details.

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Place of filing the complaint

Date of filing the complaint

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Do you request that this complaint be kept CONFIDENTIAL?  YES  NO

### 2. TYPE OF COMPLAINT

What type of complaint do you consider this to be?

- A. Operational (breach of standards, implementation, quality...)
- B. Behavioural (discrimination, bullying, etc.)
- C. Sensitive related to sexual exploitation and abuse
- D. Sensitive related to corruption or fraud
- E. Sensitive related to abuse of a Child or adult-at-risk
- F. Criminal (according to national law)
- G. Other, please explain

### 3. DESCRIPTION OF THE COMPLAINT

Please describe place, date, what happened, who were involved, and the consequences as detailed as possible. In addition, please explain whether you contacted any other individual regarding this complaint.

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Please enclose additional documents or papers to support your complaint.

#### 4. OUTCOME OF THE COMPLAINANT

Please describe the expected outcome you wish to achieve by making this complaint.

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#### 5. ACCEPTANCE

The EJ-YMCA Human Resources Department thanks you for submitting this complaint. It will follow the Complaints Mechanism set in the EJ-YMCA Accountability Framework, and will reply back to you as soon as possible.

By signing and submitting this complaint, you declare that you accept the Complaint Mechanism set by the EJ-YMCA to handle such complaints, by which the complaint will be processed and the composition of the persons dealing with this complaint will be made.

SIGNATURE

DATE

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You are kindly requested to submit your complaint to any of the following:

Mail	EJ-YMCA, 82 Nablus Rd, POB 19023, East Jerusalem
Mobile/SMS/What'sApp	+970 (0) 562610016
Website	<a href="http://www.ej-ymca.org/complaints">http://www.ej-ymca.org/complaints</a>
Email	complaints@ej-ymca.org
By hand, addressed to	Human Resources Department, located in Beit Sahour



This policy was endorsed by the EJ-YMCA Board of Directors in November 2022.