

Kenya Red Cross Society

Mainstreaming of Accountability to Communities

An Operational Case Study

December 2017, CDA Collaborative Learning Projects









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Report by: Sarah Cechvala, Senior Program Manager









About CDA

CDA Collaborative Learning Projects (CDA) is a non-profit organization committed to improving the effectiveness of those who work internationally to provide humanitarian assistance, engage in peace practice, support sustainable development, and conduct corporate operations in a socially responsible manner. For more see CDA's website: www.cdacollaborative.org.

About Kenya Red Cross Society (KRSC)

KRCS is a humanitarian organization that is an auxiliary to the National and County Governments of Kenya. It is committed to working with communities, volunteers and partners to ensure preparedness for and response to humanitarian and development needs. KRCS focuses their collective capabilities and resources to prevent and alleviate human suffering and save lives. The organization undertakes interventions in different programmatic sectors including: health and social services, disaster risk management, water, sanitation and hygiene (WASH), as well as special programs covering HIV/AIDs and the refugee operations. KRCS was established December 21st, 1965 and is guided by the fundamental principles of the International Red Cross and Red Crescent Movement (the Movement). KRCS works in eight regions in 64 counties and sub counties and currently engages 82,000 volunteers in order to serve community members across the country.

About this Case Study

Kenya Red Cross Society (KRCS) commissioned CDA to develop a detailed operational case study that documents KRCS' experience mainstreaming of the Accountability to Communities (AtC) framework across the organization. The goal of the case study is to:

- Interpret and document the elements, processes, and steps used by KRCS to effectively mainstream AtC across programs, disaster management processes, and branch teams;
- 2) Capture key lessons that can offer guidance to the International Federation of Red Cross and Red Crescent Societies (IFRC) and other Red Cross and Red Crescent National Societies

- (NS) who are seeking to mainstream Community Engagement and Accountability (CEA) approaches into their work;
- 3) Analyze and document the impact that mainstreaming AtC has had on the quality of KRCS' programs, operations, and relationships with communities; and
- 4) Assess KRCS' AtC strategy and nationwide feedback and complaints system and provide options for improving the mechanism.

How to Read this Case Study

This case study includes four chapters. Chapter One provides the background and methodology used by CDA to develop this case study. Background on KRCS's process for mainstreaming AtC is also provided in this section. Chapter Two details KRCS' experience with mainstreaming AtC. This section combines the perspectives of those who participated in the case study and CDA's observations about the steps undertaken in the process. In addition, this chapter highlights KRCS' successes in integrating AtC into their programming and discusses the factors behind the success. This section includes the challenges faced by KRCS during the mainstreaming process and options for overcoming ongoing issues. Chapter Three describes KRCS' nationwide feedback mechanism and its strengths, weaknesses, and options for enhancing practice. Finally, the chapter concludes by discussing the impact of AtC mainstreaming on KRCS' operations and the communities with whom they work. Chapter Four presents broad lessons about KRCS' experience that can be shared and adapted by other National Societies (NS). The goal is to provide an adaptable "road map" for other NS seeking to integrate AtC into their programs and operations. Chapter Five offers broad conclusions about the learning from the case study.

List of Abbreviations

- **AtB** Accountability to Beneficiaries
- AtC Accountability to Communities
- **BenComms** Beneficiary Communications
- · CEA Community Engagement and Accountability
- **C&F** Complaints and Feedback
- DSG Deputy Secretary General
- FBM Feedback Mechanism
- **HQ** Headquarters
- **HR** Human Resources
- IFRC International Federation of the Red Cross and Red Crescent
- IFSL Integrated Food Security and Livelihood
- KRCS Kenya Red Cross Society
- MEA&L Monitoring, Evaluation, Accountability and Learning
- NS National Society/National Societies
- · OD Organizational Development Department
- · PNS Partner National Society/ Partner National Societies

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Foreword: Kenya Red Cross Society Secretary General



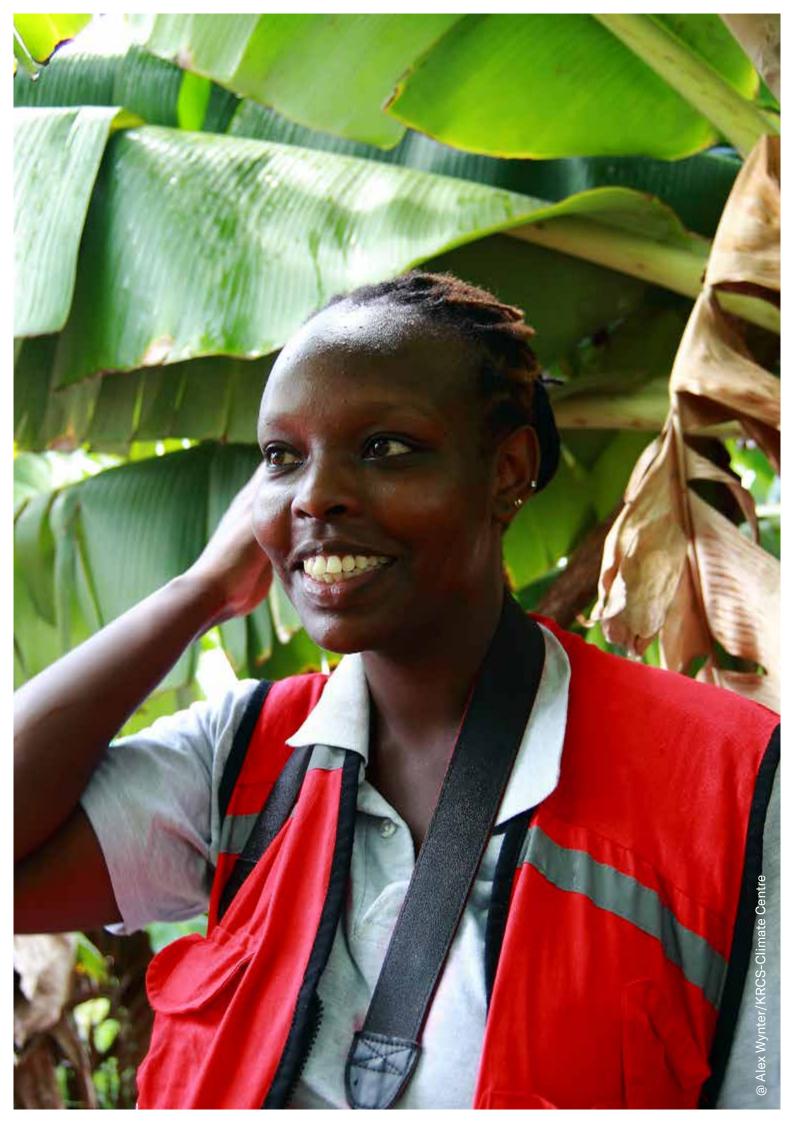
A Message from the Secretary General of Kenya Red Cross Society

Humanitarian service excellence is the focus of our strategic plan 2016 to 2020. We seek quality, value for our resources and sustainable accountability to our communities and our partners. The community is at the center of our operations as we alleviate human suffering and save lives of the most vulnerable through integrated emergency and development programs across different sectors.

As an organization, accountability to our communities means transparent communication, meaningful participation of the communities and ploughing back learnings deduced from the community voices. I am glad that we have set up complaints and feedback mechanisms that were informed by the communities themselves and this has realized insightful results in our programming and emergency operations.

I am thus pleased to share with you this documentation that details our processes, achievements, challenges, and lessons learnt towards mainstreaming Accountability to Communities. I believe this is useful to our partners and other National Societies in the RCRC movement who might be planning to establish the approach in their organization.

Dr. Abbas Gullet Secretary General Kenya Red Cross Society



Executive summary

Background & Methodology

CDA Collaborative Learning Projects (CDA) was commissioned by the Kenya Red Cross Society (KRCS) to produce an operational case study that documents the steps taken by KRCS to mainstream Accountability to Communities (AtC) across its programs and operations over a two-year period. The goal of the case study is to highlight the successes and challenges experienced by KRCS and provide practical lessons for other National Societies and the International Federation of the Red Cross and Red Crescent (IFRC) about factors that may enable a successful mainstreaming process.

CDA used a mixed-methods approach to identify and validate the strengths and weaknesses of the AtC mainstreaming process, and to ground the findings and options in triangulated data. Data was gathered through 1) desk review of key KRCS and IFRC documents, 2) key informant interviews with KRCS, IFRC, and other NS staff, and 3) 12 days in the field with KRCS staff, volunteers, and community members, which included seven process mapping exercises¹ and eight focus group discussions² across the country. Overall, CDA spoke with over 140 staff, volunteers, and community members and analyzed their views and perspectives in order to identify key strengths and weaknesses of the mainstreaming process.

Key Steps in KRCS AtC Mainstreaming Process

KRCS first pilot tested AtC integration in one sub-county in one project. Piloting AtC in this program included the following steps:

- Process mapping is an established participatory methodology that provides an informal and interactive way to engage participants in assessing features of the project or process that is being reviewed.
- Focus group discussions were conducted using CDA's listening methodology, which gathers qualitative data using a semi-structured interview process and allows for open-ended, iterative conversation directed by the experience and perspective of the interviewees.

- 1) Reviewing existing internal and external accountability practices, standards, and frameworks;
- 2) Developing minimum standards, tools, and actions for accountability at each stage of the program lifecycle;
- 3) Conducting trainings on the new standards and tools for staff at HQ and the project site;
- 4) Designing a community-based feedback mechanism for the pilot project;
- 5) Creating an internal reporting process to monitor AtC integration; and
- 6) Undertaking an evaluation of the pilot project.

Following the six-month pilot, KRCS rolled out AtC across all its programs and operations. This process included the following general activities:

- 1) Financial support for mainstreaming activities was provided by Partner National Societies (PNS);
- 2) A KRCS-specific AtC framework and programmatic minimum standards for accountability were developed through input from staff and volunteers from across the organization;
- 3) Trainings were conducted widely across the organization for staff, volunteers, and community members about the AtC framework and its implementation;
- 4) Complaints and feedback (C&F) Guidelines were developed through community and staff input about the preferred channels for communication between KRCS and its communities; and
- 5) Tools for monitoring the AtC process were adapted from the pilot and implemented as a way for KRCS to check-in with the AtC process on an ongoing basis.

Successes of the AtC Mainstreaming Processes & Key Lessons for Other NS and IFRC

Broadly, the AtC mainstreaming process was described as a success by all involved. While often difficult to

recreate, the factors that enabled KRCS' success may provide a nuanced 'road map' that can be adapted

by other NS in their AtC mainstreaming processes. These underlying factors include:

- 1) **Leadership Buy-in & Timing** Senior management's engagement in and support of the AtC mainstreaming process was fundamental to its success. In addition, discussions about the AtC pilot coincided with KRCS' development of new strategic plan. Having these concurrent conversations accentuated accountability as a core value of the organization and encouraged leaders to utilize the AtC framework in KRCS' new strategic plan.
- 2) **Piloting Phase** Piloting AtC allowed KRCS to test processes and systems and adapt them before rolling them out across all programs and operations. This may have improved staff and volunteers' overall understanding of the pillars of accountability and their roles and responsibilities in relation to these pillars.
- 3) AtC as an Institutional Objective KRCS' MEA&L staff were the thought-leaders and owners of the AtC mainstreaming process; however, the team ensured that the process was seen as an organization-wide commitment. They did this by: 1) engaging other teams early in the process; 2) requesting and using other's ideas and feedback throughout the process; 3) placing the ownership of AtC at the project level; and 4) creating accountability-related key performance indicators for staff.
- 4) **Staff Attitude & Interest** Success of AtC was largely due to the positive attitudes of all staff, the passion and interest of the MEA&L team who spearheaded the initiative, and the MEA&L team's ability to shift internal perceptions about the team's goals, roles, and strategy.
- 5) **Consultative Approach** The use of a consultative process for the development of AtC-related guidance, framework, and implementation protocols created shared ownership of the AtC process among staff, volunteers, and community members.
- 6) **Linking AtC to the Program Cycle** The program cycle was used as the vehicle to explain AtC mainstreaming and its practical applications. This process enhanced field staff's conceptual understanding of the AtC process, and assuaged concerns that AtC was a new, MEA&L-driven initiative.
- 7) **Flexibility & Adaptability** Flexibility relating to the planning for and implementation of AtC ensured that the tools and guidance were practical for the operational realities in Kenya.
- 8) **Appropriate Resourcing of the Initial Phases of AtC** IFRC and PNS were critical in ensuring that the AtC pilot and initial mainstreaming process were well-resourced. This support increased the technical expertise related to AtC across

- the organization, emphasized the initiative's importance, and encouraged staff to engage in the process and take it seriously.
- 9) **Reflection & Review** Establishing periodic opportunities to review the pilot and the mainstreaming initiative enabled KRCS to document key lessons and make alterations.

Challenges to AtC Mainstreaming

KRCS faced several challenges, some of which the organization was able to overcome while others are ongoing. These challenges can broadly be described as:

- 1) **Emphasis on the Feedback Mechanism** Staff were trained on the entire AtC framework across the program cycle. In practice however, much of the focus was on the creation of the feedback mechanism (FBM). Prioritization of the FBM has led to a less rigorous application of the other minimum standards.
- 2) **Resourcing & Regional Inconsistencies** Longer-term resourcing of the AtC mainstreaming processes (including both human and financial resources) has been neglected. This has led to inconsistencies in the implementation of AtC across the organization's programs and operations.
- 3) Nation-wide FBM— The newly established FBM largely functions by gathering data from the field through channels determined by the C&F Guidelines. KRCS has an internal referral system that allows feedback from communities to travel to county, regional, and national offices. When issues cannot be addressed by field staff, they are resolved by C&F Committees at the county, regional, or national office. Issues are escalated between these three levels depending on the committee's ability to respond to the complaint or feedback. Feedback is sometimes logged into a database at each level of the organization. Data is shared on a monthly basis with staff at the national level in order to resolve ongoing issues or to guide programmatic adaptations when necessary. Overall, the FBM struggles with a number of gaps, including: the channels available for communities (particularly the national toll-free line), limited channels for information provision about KRCS

broadly (including its mission, programs, FBM, etc.), weak internal system, and inconsistencies in responding to community feedback.

Key Impacts & Conclusion

The integration of AtC into KRCS' projects and operations has had a tremendous impact on the way the agency works with the communities it serves. Several key impacts include:

- 1) **Increased Trust** AtC created an increased sense of mutual trust and engagement between KRCS staff and volunteers. Trust has strengthened lines of communication, making it possible for community members to engage in an honest dialogue about project implementation and outcomes.
- 2) **Enhanced Project Sustainability & User-Driven Projects** The shift towards a consultative approach encouraged more community members to become involved in and lead their own development initiatives. This has enhanced project sustainability and community resiliency.
- 3) **Improved Access, Security, & Early Warning Systems** Increased and transparent communication and enhanced trust between KRCS and communities has allowed staff to operate more safely and appropriately in the context in which they are working.

Overall, through an intentional and deliberate process, accountability has become embedded in the organization's core values and throughout all its activities. Support (both financial and technical) from IFRC and PNS has helped to ensure that the process has had the appropriate technical expertise and resources in order to ensure broad uptake. This external support combined with internal promotion and endorsement (particularly by senior management) set a tone about the importance of accountability. In addition, AtC was also rolled out in a way that mandated broad ownership by all staff, volunteers, and community members. This has helped to ensure high levels of engagement by everyone. Collective ownership has led to collective success. However, accountability is not a one-time endeavor; rather, it is an ongoing process that needs to be periodically evaluated and revised to guarantee that it meets its objectives in a contextually and operationally appropriate way.



Chapter one: case background & methodology

Section 1: Background on Accountability to Communities in Kenya Red Cross Society

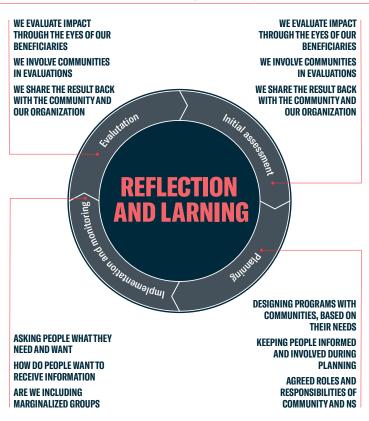
One of the core values of the International Red Cross and Red Crescent Movement (the Movement) is working in partnership with communities in order to improve program quality, reduce local vulnerabilities, and build safe and resilient communities. This approach is enshrined in the Movement's Code of Conduct in Disaster Relief³ and The Principles and Rules for Red Cross and Red Crescent Humanitarian Assistance.⁴ These core values, coupled with increased sector-wide attention on remaining accountable to communities, led the IFRC to establish the Community Engagement and Accountability (CEA) approach. The CEA approach provides a set of activities intended to place communities at the center of all National Societies' (NS) activities and operations.

As part of the CEA approach, the IFRC developed the Accountability to Communities (AtC) initiative,⁵ which provides a framework and a set of minimum standards intended to support NS' pivot towards greater accountability. *Transparency, participation, feedback mechanisms, and community-led monitoring and evaluation* represent the four minimum standards or pillars of the AtC framework.⁶ Each pillar of accountability is designed to provide a common goal for all programs and is expected to be integrated across all program lifecycles and emergency operations (see below diagram). Recognizing the uniqueness of each National Society's operations and programs, the AtC framework is designed to be flexible and adaptable.

- 3 See: http://www.ifrc.org/Docs/idrl/I259EN.pdf
- 4 See: http://www.ifrc.org/docs/idrl/I28oEN.pdf
- 5 AtC was called the Accountability to Beneficiaries (AtB) initiative.
- Development of the minimum standards required review of internal (e.g. International Red Cross and Red Crescent Movement's Code of Conduct and the Principles and Rules for Red Cross and Red Crescent) and external (notably the Humanitarian Accountability Partnership 2010 HAP Standard in Accountability and Quality Management), guidance and tools for accountability to communities.

In 2014, Kenya Red Cross Society (KRCS) volunteered to be a pilot country for the AtC initiative. During the six-month pilot phase, KRCS selected Kinango's Integrated Food Security, and Livelihoods (IFSL) project in the Kwale County Branch in Kenya's coastal area as the site for the AtC pilot. In an effort to not lose momentum or the lessons from the pilot phase, KRCS developed a strategy to mainstream AtC across the entire organization as soon as the pilot phase ended. The monitoring and evaluation (MEA&L) team led the AtC mainstreaming process, with support and input from every department at every level (sub-county offices, county offices, regional offices, and headquarters in Nairobi). Mainstreaming AtC across all programs and operations required that all new projects include the AtC minimum standards, while ongoing projects identify the appropriate moment in the project phase to incorporate AtC. This case study captures the lessons learned from KRCS' AtC experience, starting with the pilot in 2014 and continuing to the present day, when AtC has been mainstreamed across all its operations and program activities.





- 7 Three other National Societies (NS) from the East Africa and Ocean Islands Cluster including: Madagascar Red Cross, Sudan Red Cross, and Burundi Red Cross – also took part in the pilot initiative.
- 8 Kinango is a sub-county branch office within the Kwale County Branch, which is in the coastal area of Kenya.
- KRCS has 8 regional offices covering the government administrative regions and 64 county and sub county offices which fall within the various regions across the country. Projects are managed by sub-county and county offices.
- 10 As of December 2017, when this case study was written

Section 2: Case Study Methodology

This case study focuses on the steps undertaken by KRCS to mainstream AtC across its operations and highlights both the successes and challenges experienced by KRCS. Documenting this process will shed light on what enabled successful mainstreaming, what challenges were encountered during this process, and how those challenges were addressed. These lessons can help IFRC and other NS to adapt the KRCS model when integrating AtC into their operations. The case study offers a range of options for ways to enhance AtC mainstreaming and to address ongoing challenges. These options are informed by CDA's extensive experience reviewing effective accountability practices of aid organizations across the world; however, CDA recognizes that KRCS knows their operational and organizational context and will be able to best determine what options may and may not be feasible.

Question: How would you describe the level of your position?



Other Category – majority of respondents were volunteers, some MEA&L staff, and some branch-level staff

To document KRCS' experience, CDA used a mixed-methods approach to identify and validate the strengths and weaknesses of the AtC mainstreaming process and to ground the findings and options in triangulated data. Initially, CDA undertook a desk review of key documents relevant to the AtC implementation process and IFRC's tools for the AtC framework.¹¹ This desk review enhanced CDA's understanding of the IFRC and NS's commitment to accountability and provided a baseline for the integration process to date. Prior to fieldwork, CDA also developed a survey to gather quantitative data from a wide array of KRCS staff. This survey asked staff questions about their experience with the mainstreaming process in order to better understand different staff members' role in each step of the process and their overall impression of the experience. CDA collected 79 responses to the survey, which included 13 questions (see above chart of the breakdown in survey respondents). Data from this survey supplemented the qualitative information gathered during the in-country field work.



Qualitative data was collected during a field visit to Kenya by CDA's Senior Program Manager, Sarah Cechvala. CDA spent 12 days with KRCS between November 26 and December 7, 2017. During this time, CDA visited three county branches (Kwale, Turkana, and Malindi) and one sub-county branch (Kilifi sub-county branch in Kwale County) including: approximately four days in Turkana County in the northeastern region, and approximately five days in the Malindi and Kwale Counties, located in the coastal region (see map below). In Turkana County, CDA visited the county branch office in Lodwar and the communities

participating in KRCS' cash transfer programs in Kakong, Kainuk, and Lokichar. While in the coastal region, CDA met with beneficiaries of KRCS's cash transfer program in Bamba (Ganze), Integrated Community Resilience Building project in Lukole (Magarini), and the Conflict, Peace, and Economic Opportunities for Youth Project in Kwale County. In each region, CDA was accompanied by an MEA&L staff member from headquarters, the regional reporting officer (who oversees the integration of AtC across their specific region), and program staff from the regional offices. KRCS staff and volunteers provided translation when necessary. Finally, CDA spent three days in Nairobi with staff at KRCS headquarters including: senior managers, program staff, Partner National Society (PNS) staff, and the MEA&L team. CDA was unable to interview the HR team. While the HR team provided a written response to several questions, some of the information related to key performance indicators of staff and the new staff onboarding process have not been verified by the department.

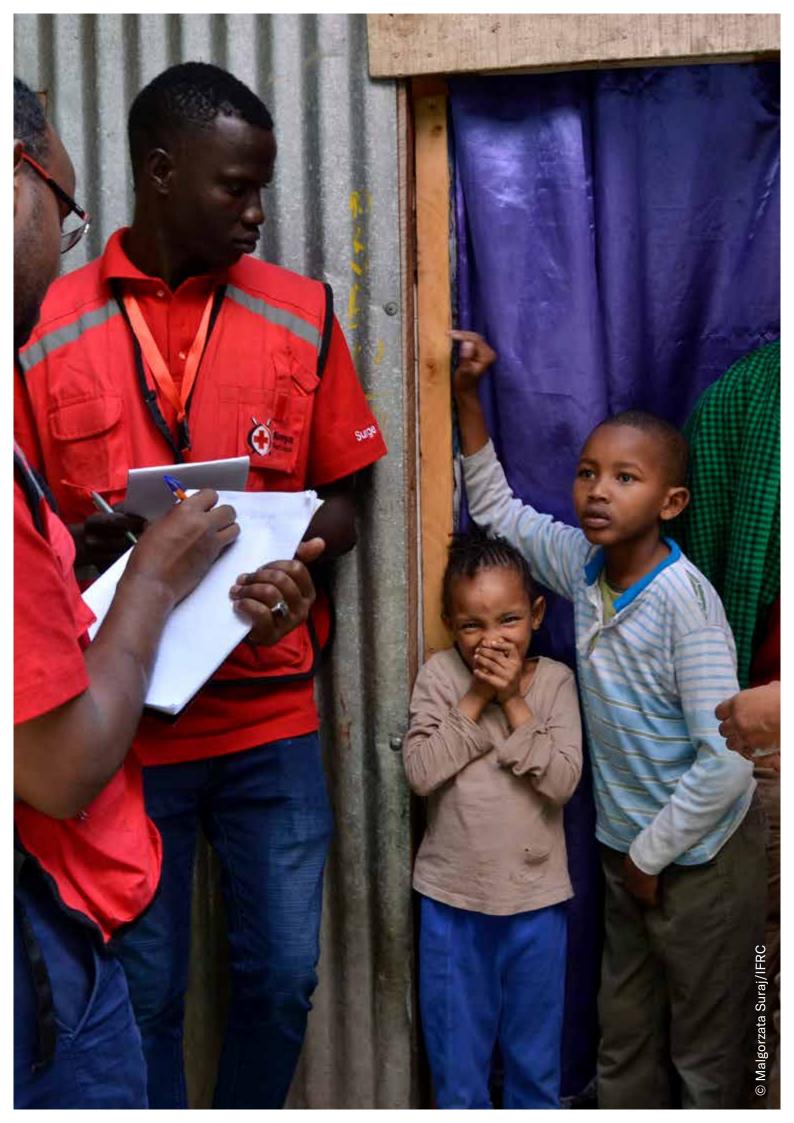
While in country, CDA gathered qualitative evidence during seven process mapping exercises with staff and volunteers. Process mapping is an established participatory methodology that provides an informal and interactive way to engage participants in assessing features of the project or process that is being reviewed. Each process mapping exercise asked staff or volunteers to map the AtC mainstreaming process from their perspective (based on role, level of engagement, etc.) and then assess their level of satisfaction with each step of the process. CDA used a four-point scale to rate the level of satisfaction. Smiley faces were used to rate the level of satisfaction in order to remove any language barriers, and, in some cases, translators helped with clarification. Following the assessment, staff and volunteers reflected on the entire process and described the successes and gaps in the experience, as well as ongoing challenges they face with the mainstreaming of AtC. In the field, five separate process mapping exercises were conducted with regional staff and regional volunteers. At headquarters, two process mapping exercises were conducted: one with the MEA&L team and one with the program managers and advisors.

Data collected through the process mapping exercises was supplemented by eight focus group discussions (FGDs) that were conducted with community members (men, women, and youth), and six key informant interviews with relevant staff, volunteers, project committees, and community members. Focus group discussions were conducted using CDA's listening methodology, which gathers qualitative data using a semi-structured interview process and allows for open-ended, iterative conversation directed by the experience and perspective of the interviewees. FGDs and key informant interviews deepened our understanding of how AtC mainstreaming efforts were perceived. Participants were asked to assess how well AtC processes are functioning and to provide feedback on how they can be further strengthened.

QUALITATIVE DATA POINTS

DATA POINT	# PARTICIPANTS	
Process Mapping: Turkana Regional Staff	5 Staff Members	
Process Mapping: Turkana Volunteers in Kainuk	4 Volunteers	
FGD with Men, Women, and Project Committees in Turkana County e.g. Lokichar, Kakong, Kainuk	43 Community Members	
Process Mapping: Malindi & Kilifi Regional Staff	4 Staff Members	
Process Mapping: Malindi & Kilifi Volunteers	11 Volunteers	
FGD with Men, Women, and Project Committees in Malindi & Kilifi e.g. Lukole and Bamba	31 Community Members	
Process Mapping: Kwale Regional Staff	7 Staff Members	
FGD in Kwale with Project Committee	9 Members	
FGD in Kwale with Youth Groups	10 Members	
Process Mapping: Program Managers at HQ	7 Staff	
Process Mapping: MEA<eam at HQ	6 Staff	
Key Informant Interviews	6 Staff	
TOTAL PARTICIPANTS	143 People	
7 PROCESS MAPPING EXERCISEs / 8 FGDs / 6 Key Informant Interviews		

In some cases, KRCS and CDA convened separate focus group discussions (FGD) simultaneously to save time; notes were shared following these FGDs. Key informant interviews were undertaken with staff of several Partner National Societies, IFRC, and key KRCS staff. CDA also conducted several remote key informant interviews with staff at headquarters in Nairobi, as well as staff at Sudan Red Crescent Society, who are also working on AtC integration. Over the course of this research, CDA spoke with 143 people engaged in or touched by the AtC process (a breakdown of participants is provided in the above chart).



Chapter two: Kenya Red Cross Society's experience mainstreaming Accountability to Communities

Section 1: Accountability to Communities Mainstreaming Process & Key Observations

CDA's process mapping exercises documented the primary steps in the AtC mainstreaming process to date and provided a platform to assess its strengths and weaknesses. The following table provides a broad overview of the AtC process based on the perspectives of KRCS HQ staff, field staff, and volunteers.

Overview: steps in Krcs' Atc mainsreaming process

In 2014, IFRC requested volunteers for piloting the AtC approach. KRCS' Deputy Secretary General (DSG) met with unit heads (HQ staff from Programs, MEA&L, HR, IT, Finance) to discuss the pilot's possibility. Concurrently, KRCS' senior management was discussing accountability as a core value in their new strategic plan. Recognizing the moment was ideal to advance its goals relating to community accountability, KRCS elected to participate in one project in Kinango sub-county in Kwale County.

Six Month Pilot Phase

- Review of Existing Practices An independent consultant undertook a review of current accountability practices at KRCS.
- Minimum Standards, Actions, & Tool Development– Based on existing practices, the consultant worked with the pilot National Societies (NS) to develop and adapt existing AtC minimum standards to suit their context and develop a set of practical actions that would help them to implement AtC at each stage of the program cycle or operation. This process also helped to identify the AtC tools that each NS would need to implement these standards and actions.
- 3) Training A two-day training curriculum was developed by IFRC and an independent consultant for NS staff on the new standards, actions, and tools. Alongside NS MEA&L staff, the consultant delivered the training to HQ staff including regional project coordinators and teams, who shared the training and tools with the rest of the project staff and volunteers in the pilot project.
- 4) Design of a Community-Based Feedback Mechanism Using the AtC tools, project staff and volunteers conducted FGDs with communities to identify their preferred feedback channels, which were shared with and approved by the MEA&L team. During subsequent community dialogue meetings, staff and volunteers shared information about the available channels.
- Development of Internal Reporting Processes Project staff collected feedback from communities, volunteers' log sheets, and action reports, and incorporated this feedback into each monthly report. Regional and headquarters (HQ) officers reviewed reports and provided feedback to staff. Staff raised concerns about the increase in reporting requirements, so the MEA&L team created a one-page template report to help staff decide what information to share in the reports.
- 6) Pilot Evaluation An independent evaluation documented the pilot process and community perspectives concerning the AtC. This report was shared with program and field teams, IFRC support staff, and the program team at HQ and Partner National Societies, involved in the AtC pilot.

Integrating AtC into all KRCS' Programs and Operations

- Request for Additional Support Recognizing the significance of AtC mainstreaming, the MEA&L team sought additional funding from the American Red Cross and Finnish Red Cross (Partner National Societies) to undertake training and dissemination events in other regions.
- 2) Development of KRCS' AtC Framework IFRC and the MEA&L team conducted a training for regional project officers and HR staff about adapting the framework for KRCS programs and operations. Feedback from this event, combined with a desk review of other agencies' accountability frameworks and data from the pilot process, helped the MEA&L team draft KRCS's AtC framework. To get feedback on the draft, the MEA&L team circulated it via email to PNS, IFRC, as well as field and HQ staff. Feedback was integrated, and senior management

- approved the final draft. The framework outlined the processes for incorporating AtC into existing programs and new programs.
- Organization-Wide AtC Trainings The MEA&L team convened trainings for project teams and volunteers about incorporating the AtC framework into the project lifecycle. During the initial training, approximately 45 managers and officers from program teams, operations, and at the county and sub-county branch level were trained. Trainings at the branch level included a large number of staff and volunteers (e.g. in Malindi, 30 staff members and volunteers). Subsequently, in new projects, regional staff and volunteers held AtC trainings for government actors, community members, and project committees. Ongoing projects identified appropriate moments to include AtC trainings and other AtC-related capacity building efforts. This was done on a project by project basis. In some cases, when a new project convened an AtC training, staff working on older projects would be invited to participate. At HQ, the MEA&L team hosted quarterly one-hour brown bag lunches sponsored by the Finnish Red Cross (PNS), in order to share information about AtC with HQ staff.
- 4) Regional Trainings & Community Feedback Channel Assessment
 The MEA&L team conducted a series of regional trainings for
 staff and volunteers on assessment tools for collecting data from
 communities. In all eight regions, staff and volunteers undertook
 assessments to identify communities' preferred feedback channels.
 The MEA&L team analyzed the trends and outlined the preferred
 channels for each region. Findings were shared and validated in a
 series of consultative meetings with regional program managers;
 and each region agreed on their top three feedback channels.
- Development of KRCS' Complaints and Feedback Guidelines During an annual review meeting, the MEA&L team worked with senior management, regional managers, and program staff to find practical ways of setting up the feedback channels. Following this meeting, the MEA&L team drafted KRCS' Complaints and Feedback Guidelines (C&F Guidelines) and shared it with all staff via email for input before finalizing the guidelines. The MEA&L team convened regional workshops to inform staff about the guidelines, including feedback channels and timelines for receiving and responding to feedback. At the field level, staff and volunteers shared information about the new feedback channels with community members. County, regional, and national Complaints and Feedback Committees (including a board member, country coordinator, and a program representative) were established in order to review and resolve complaints. On a weekly basis, the county committee reviews feedback. Unresolved issues are escalated to the regional committee and then to the HQ committee. At HQ, a toll-free line, managed by an HQ accountability officer, was established as a nationwide feedback channel.
- 6) Establishing Tools & Systems for Monitoring the AtC Process During the pilot, the MEA&L team adapted the quarterly program report to document aspects of the AtC process. Each month, community members are asked to give feedback during project committee meetings and community review meetings. Monthly, volunteers share their log sheets with staff who incorporate the information into monthly reports and share them with the MEA&L team and program managers. MEA&L staff participate in quarterly coordination meetings to check-in with regional staff about the AtC process and troubleshoot any challenges. Feedback from the national toll-free line is collected by the HQ accountability officer and shared with appropriate field staff. MEA&L staff have integrated key questions relating to AtC into baseline, midline, and endline evaluations.

Survey and conversations with staff showed that experiences of the AtC mainstreaming process varied based on the position, responsibilities, and location (field or HQ). For example, the MEA&L team described a high level of involvement and provided the most detailed account of mainstreaming steps due to the team's oversight role. Program managers at HQ discussed an early engagement in the development of the AtC framework and the implementation of the C&F Guidelines. Field staff and volunteers described their involvement in training sessions on AtC as well as their role in collecting feedback from communities and sharing the results of those discussions with communities afterward. Field staff also discussed the practical application of AtC in the program lifecycle - e.g. participatory project committee selection, the process of developing a beneficiary communication plan, and community meetings to review feedback. Community members with whom we spoke acknowledged the increased level of staff engagement in their communities, and, in some cases, a higher level of community ownership over KRCS' programs, activities, and outcomes. In addition, many community members were aware of the KRCS' nationwide feedback mechanism and the channels to reach KRCS that are available to them.

Even with the varying experiences, it is important to note that all staff, volunteers, and community members with whom we spoke described the six steps of the AtC mainstreaming process and understood AtC minimum standards and their importance. Across the organization, there was also an acknowledgement of KRCS' commitment to the principles of accountability and ensuring community participation in all their activities. The pilot was described by most staff and volunteers as a success and was seen as important for the overall AtC mainstreaming. In addition, CDA was impressed by KRCS' ability to learn from the pilot process and begin to embed AtC into all programs and operations in such a short timeframe. Furthermore, the process mapping highlighted extensive planning and strategic thinking behind the design and implementation of the organization-wide AtC mainstreaming process.

It is important to remember that the mainstreaming of AtC is an ongoing endeavor that takes time and requires reflection and review. As one PNS representative said, "They [KRCS] have done this all rather quickly; but it's a process which takes time." Overall, there was a general satisfaction with the steps taken in the AtC process and the tools, frameworks, and guidelines produced as a result of AtC mainstreaming. However, all staff and volunteers described challenges that had to be overcome during the mainstreaming process or that still exist as part of the integration of the AtC framework into projects.

Section 2: Factors behind Kenya Red Cross Society's Success

Broadly, the AtC mainstreaming process was described as a success by all involved – staff, volunteers, and community members. Success, however, is not solely a result of individual steps undertaken to mainstream AtC. This case study highlights the underlying factors that created an enabling environment for a successful process. While often difficult to recreate, understanding these factors can help with the development of a more nuanced 'road map' that can be adapted by other NS in their AtC mainstreaming processes. The section below outlines CDA's observations, as well as feedback from staff across KRCS, IFRC, PNS, volunteers, and community members about the factors that contributed to this success.

Leadership Buy-In & Timing

Discussions about the AtC pilot coincided with KRCS' development of new strategic plan. Although this was purely coincidence, having these conversations at the same time accentuated accountability as a core value of the organization. It also encouraged leaders to utilize the existing framework for accountability (the AtC framework) while developing their new strategic plan. KRCS' strategic plans have consistently included accountability as a key element; however, in light of a revision of the previous strategic plan, management felt that the organization as a whole underperformed on meeting key standards related to accountability. As an additional incentive to take on an AtC pilot initiative, there was competition among different NS for incorporating AtC tools and volunteering for the pilot process.

In addition, the MEA&L team strategically linked the AtC process to KRCS' value-for-money metrics. This enabled them to make a stronger case for pursuing AtC integration on the basis of improved institutional efficiency, effectiveness, economy, and equity. Simultaneously, the entire aid sector has felt a mounting pressure for a cultural shift from a top-driven system to a user-driven approach, which further encouraged KCRS leadership to see the importance of investing time, resources, and energy into accountability to communities. The coalescing of these factors created an opportune moment for KRCS to emphasize its commitment to accountability by embedding it into the strategic plan and volunteering to participate in the regional AtC pilots.

This created a favorable institutional environment for the AtC process by building strong commitment and buy-in from KRCS' senior leadership. Staff across the organization emphasized that senior management's engagement in and support of the AtC mainstreaming process was fundamental to its success. Many noted that when leadership demonstrates a commitment to an initiative, staff and volunteers

recognize its value and significance and it becomes an institutional priority. These actions also set a tone and influenced organizational culture to ensure that the principles of accountability are taken seriously by staff. One staff member explained, "A commitment by leadership is essential. KRCS leaders stressed that AtC should be part of all our processes, so that we can improve our work."

AtC as an Institutional Objective

While MEA&L staff were the thought-leaders and owners of the AtC mainstreaming process, they were acutely aware that the initiative's success would rely on high levels of engagement by the entire organization. This was fundamental for several reasons:

- 1) The small MEA&L team (roughly six staff members) could never manage and ensure successful capacity building and mainstreaming without the involvement of program staff across the organization.
- 2) AtC fundamentally alters the way in which field staff conduct their work directly with communities, and therefore it was essential that field staff understood and committed to these increased standards of accountability.
- 3) Historically the MEA&L team has been seen as a 'policing' department. In such an environment, AtC mainstreaming may be seen as an additional requirement forced on programmatic teams by the MEA&L team, which could limit program staff's buy-in.

"They [the MEA&L team] took what we share with them and they heard our [field staff's] voice. This has been important in sharing the local voice with headquarters." – Field Staff

However, while ensuring that AtC was seen as a "whole of institution" approach, the MEA&L team maintained oversight and technical support of the initiative. One MEA&L staff member explained that this was to ensure that someone was in fact guiding the initiative forward and evaluating its progress, avoiding the common trap of: "when it becomes everyone's responsibility, it becomes no one's responsibility." Another success of the process was how efficiently the MEA&L team was able to mainstream the AtC framework. The MEA&L team's ability to quickly establish internal systems and develop the capacity of staff and volunteers meant that field staff did not need to wait for branch managers to get onboard with the process. Instead, program managers in headquarters began demanding components of the AtC framework, which motivated field staff to begin making the system work on the ground.

Strategically, the MEA&L team took proactive steps to ensure that AtC was seen as an institution-wide objective, and not an MEA&L or program team initiative. The MEA&L team accomplished this by:

Early engagement of other teams. It was particularly important to engage program managers at HQ early on in the process because of their ability to influence and manage programmatic approaches and support program staff in the field. Program managers were first engaged in the AtC process when the MEA&L team asked for their input and feedback on a draft version of the AtC framework. Other teams at HQ were also engaged early on to support AtC mainstreaming. For example, during the pilot phase, the MEA&L team convened a meeting at HQ with staff from other departments including finance, IT, HR, programs, and senior management to present the findings of their ongoing review of KRCS' accountability systems. During this meeting, these staff were asked to discuss how accountability fit into their unit and what steps could help to enhance accountability in their work.

Request for and inclusion of others' ideas. At different moments in the mainstreaming process (such as during the development of the AtC framework, creation of the C&F Guidelines, etc.), the MEA&L team paused and requested feedback from colleagues. Inclusion of other staff demonstrated the MEA&L team's commitment to ensure that AtC was seen as an institutional process, as opposed to just an MEA&L priority. Staff across the organization discussed their appreciation for being included in the process. Many noted that it helped them to better understand the purpose and goal of AtC, while also allowing them to provide feedback that enhanced the ability of field teams to practically integrate AtC into their programs. Perhaps more importantly, however, many staff remarked that they could actually see their feedback included in the framework and tools. This demonstrated that the MEA&L team saw their feedback as valuable, which helped improve relations between the MEA&L staff and other KRCS departments. Using a collaborative approach enabled the MEA&L to remain accountable to their colleagues and uphold accountability as a fundamental core value of the organization both externally – with partners and communities – but also internally – with colleagues.

Placing ownership at the project level. While the MEA&L team was the original designer of the AtC framework, they quickly built the capacity of other staff in order to increase the number of staff members that could use, and eventually instruct others to use, the AtC framework. After providing the initial training, the MEA&L team turned much of the training over to staff at the regional, county, and subcounty levels. While the MEA&L team often supported trainings, it was the field staff who trained other staff and volunteers, on-boarded new staff, and sensitized community members about the AtC process. Placing the responsibility of advancing the initiative at the field level strengthened many field staff members' commitment to and engagement in the AtC process; it also ensured that the MEA&L team did not become the gatekeepers of AtC. One field staff member explained the

importance of this process: "This [the cascading trainings] was key because everyone who has gone through this process can now do it and help others do it too."

Creation of accountability-related key performance indicators (KPIs). HR's early involvement also enabled the integration of accountability principles into the KPIs of staff (e.g. including communities in activities, establishing a community-level FBM, sharing information with the community, etc.) Staff across the organization discussed that the inclusion of direct targets related to AtC in their KPIs provided an incentive to get involved and support the initiative.

Staff Attitude & Interest

"Staff need to have a positive attitude about this [AtC] in order to do it well. They need to take it [AtC] as a friend and not as an enemy." – MEA&L Staff

In general, staff's perceptions of the AtC framework were largely positive, and many felt that the initiative was effective. This success can largely be attributed to the positive attitudes of all staff, the passion and interest of the MEA&L team who spearheaded the initiative, and the MEA&L team's ability to shift internal perceptions about the team's goals, roles, and strategy. As previously noted, for a long time, the MEA&L department were seen by field staff as the organization's "police force". Shifting this perception was not easy or quick. However, the MEA&L team acknowledged that the effective mainstreaming of AtC would require staff to see the MEA&L team as coaches and a support team, rather than as an enforcement and oversight entity.

One of the most important contributions of the MEA&L team was their commitment to going to the field to work directly with front-line staff. This hands-on involvement allowed the MEA&L team to demonstrate how AtC was already a core component of field staff's work and enabled them to provide concrete advice about how to better engage with the AtC process. One MEA&L team member explained, "Integration of field staff into the process was critical. Often, the county coordinator is too busy, so we just went straight to the field teams." A PNS staff member echoed the importance of the increased on-the-ground support for field staff by the MEA&L team. CDA was impressed by the level of engagement by the MEA&L team and their relationships with field staff. One field staff member explained that she almost always reaches out to her MEA&L colleague in Nairobi for input and support before she seeks advise from her own manager in her office. She explained that the closeness in their relationship during the AtC integration process was fundamental to enhancing her confidence in the MEA&L team's support for field staff and their programs and activities.

Finally, the MEA&L team's passion for mainstreaming the principles of AtC should not be understated. As one MEA&L team member noted, "Without passion you cannot achieve anything." It was through this conviction that the MEA&L team was able to reflect on how they were internally perceived by colleagues and identify ways of shifting those perceptions. In addition, skills such as listening, problem-solving, coaching, and flexibility were critical for the MEA&L team in order to demonstrate that they supported a collaborative approach for the mainstreaming of AtC.

Consultative Approach

Repeatedly, CDA heard staff, volunteers, and community members describe a specific consultative approach used by KRCS to engage others in developing guidance, defining protocols, and implementing the AtC initiative. Broadly, this approach included the following features:

- 1) Identifying the specific need or challenge by an individual or team;
- 2) Gathering input from all stakeholders in order to better understand the need and analyze the issue;
- 3) Drafting of guidance, tools, frameworks, etc. by an individual or team based on the stakeholder input;
- 4) Sharing a draft with all stakeholders for feedback;
- 5) Incorporating the feedback and finalizing the material; and
- 6) Disseminating the guidance, tool, framework, or information through various methods including trainings, meetings, etc.

Staff and volunteers described how they used this approach during the development of the AtC framework and the C&F Guidelines, and when gathering information from community members about feedback channel preferences, selection of project committee members, and beneficiary selection criteria. This consultative approach was participatory yet simple and was used by staff and volunteers in both internal and community-facing processes.

Linking AtC to the Program Cycle

During trainings, the MEA&L team used the program cycle as the vehicle to explain AtC mainstreaming and its practical applications. Primarily, MEA&L staff used the AtC mainstreaming tools developed in the pilot to demonstrate how the four minimum standards could be implemented at each stage of a program's lifecycle (Stage 1: Project Initiation; Stage 2: Project Planning; Stage 3: Project Implementation; and Stage 4: Project Evaluation). Not only did this process enhance field staff's conceptual understanding of the AtC process, but it also assuaged concerns that AtC was a new, MEA&L-driven initiative. When the AtC framework was linked to the program cycle, staff were able to see how, in many ways, they were already

employing the AtC principles in their programs. One MEA&L staff member explained, "Training staff without following the program cycle would have been confusing to staff — they would have asked, 'What is this animal?'"

Flexibility & Adaptability

Planning for and implementing of AtC required the MEA&L team to be flexible in their approach. This was of particular importance during the piloting process, which set the tone for the larger mainstreaming initiative. For example, during the pilot phase, the MEA&L team quickly and creatively modified the reporting requirements in order to respond to the concerns and needs of field staff. For instance, when staff noted that the AtC framework increased the burden of monthly reporting, the MEA&L adapted the template. This served as an excellent illustration of an effective internal feedback loop.

In addition to flexibility, MEA&L staff ensured that much of the AtC tools and guidance were practical for the operational realities in Kenya. For example, the team modified the AtC trainings to be based on contexts and programs that were familiar to KRCS staff. This was crucial to enhance staff's understanding and provide an approach fit for purpose and the work they were undertaking.

Appropriate Resourcing of the Initial Phases of AtC Mainstreaming

Adequate resourcing for accountability initiatives - including both financial and human resources – is essential for effective practice, and yet it is commonly overlooked. Often, increased institutional and donor pressures for enhanced accountability efforts are not coupled with increased resources to fund the endeavor and ensure that staff have the appropriate skills to undertake the necessary activities. IFRC and PNS were critical in ensuring that the AtC pilot and initial mainstreaming process were well-resourced. In particular, IFRC provided financial support and technical expertise for KRCS' MEA&L staff, who then transferred the expertise to staff and volunteers throughout the organization. Additionally, the fact that the IFRC, American Red Cross, and Finnish Red Cross provided funding for the AtC pilot also emphasized the initiative's importance and encouraged staff to engage in the process and take it seriously. Following the pilot phase, the MEA&L team recognized the need for additional funding for more trainings and dissemination initiatives. Additional funding was provided by the same PNS, which was fundamental to ensuring that the MEA&L and program teams were able to continuously train, mentor, and support field teams working on AtC mainstreaming.

"Funding the AtC process was important to us [PNS]. We have seen staff [KRCS] become the community's peer. It's an important shift." – PNS Staff

Section 3: Operational & Community Impact

Undoubtedly, the shift to AtC within project lifecycles and across operations has had a tremendous impact on the way KRCS works and on the communities it serves. Discussions with staff, volunteers, and community members all described various improvements to relationships and modes of operating that can be directly attributed to the AtC process. This section briefly describes these impacts.

"Before, we might not have been providing things that the community needed. We directly saw this with some of our programs, when we asked the community to participate in the process." - Volunteer

Increased Trust

Staff and community members described an increased sense of mutual trust and an increased presence and engagement by KRCS staff and volunteers. One community member said, "I trust them because they keep coming and following up." Staff explained that improvements in trust between KRCS and community members have enhanced their ability to work effectively and to design and implement projects appropriately. Trust has strengthened lines of communication with community members, making it possible to have an honest dialogue about project implementation and project outcomes.

Enhanced Project Sustainability & More User-Driven Projects

When KCRS supports community ownership through a participatory approach during the project, it enhances sustainability after the agency has exited or closed the program. Volunteers noted that the shift towards a consultative approach has encouraged more community members to become involved and lead their own development initiatives. Gathering information and reporting on decisions taken based on feedback has enabled KRCS to open strong lines of communication with the community, which has increased community participation in KRCS activities. As one volunteer noted, "AtC gives them [community members] a chance to be involved and lead."

Sustainability was noted by community members as a crucial contribution of the AtC process. Community members felt that increased participation in projects allowed them to dictate the terms of the project, and in some cases, maintain the project's impact after it has closed. One community member explained, "We

can now continue the project even if KRCS goes away." Many community members described KRCS interventions as community projects that are supported by KRCS, as opposed to KRCS-driven initiatives. With a shift to the AtC framework's inclusive, participatory approach, projects and operational activities are now commonly driven by community need as opposed to donor logframes and organizational mandates. User-driven programming often means enhanced project sustainability and community resiliency. Staff explained that they directly saw improvements in programs with the shift to a participatory approach. One staff member explained, "The community knows best what project works for them. So, partnering with them is the best way to do this." Another staff member concisely explained that with the AtC approach, "We [KRCS] are moved by their [community members'] desires." Community members echoed these sentiments and explained that increased engagement and participation from their end has enhanced ownership and overall project impact. One community member explained, "Because they ask for our input, the projects are stronger and now meet our needs." Furthermore, staff also felt that AtC allowed programs to be driven by practical issues felt by communities on the ground. One staff member called this "fact-based programming," and explained that this approach makes projects more fit for purpose, which has increased project effectiveness and often improved cost effectiveness.

Example: increased security

As part of a project in Turkana, staff were building a fence to enclose a particular area of the community. Due to increased communication practices under the AtC initiative and trust between the community and KRCS, community members alerted KRCS to security concerns in the area. Specifically, community members explained that KRCS should build two exits to the fenced-in area, so that if a conflict arose (which is common in the area), staff would have a quick and safe exit.

Improved Access, Security, & Early Warning Systems

Due to increased and transparent communication and enhanced trust between KRCS and communities, community members are more likely to share information about security with staff and volunteers. In Turkana, for example, this has been extremely important for maintaining staff safety.

Staff explained that before AtC, community engagement was often seen as a box-ticking effort with little engagement or follow-up with the community. Under the AtC approach, staff feel that their understanding of the local context has been greatly improved due to increased and early communication with community members. Understanding the context is critical as it helps staff and volunteers ensure that programs are appropriate; in addition, changes to the context

can also provide early warning indicators about new challenges or issues that can impact the community and KRCS. Overall, AtC mainstreaming has enabled staff and volunteers to be better prepared to adapt to the quickly changing nature of their operations

Section 4: Challenges to Accountability to Communities Mainstreaming & Options for Enhancement

KRCS' accomplishment in effectively mainstreaming the AtC across its operations and programs should not be understated. However, a critical feature of effective accountability practice is the ability to reflect on, review, and learn from the experience to facilitate improvement. Remaining accountable to communities requires ongoing attention from all stakeholders so that systems and processes can be adapted based on the practical realities of the context and the needs of those whom KRCS serves. As part of this case study, CDA documented gaps faced during the pilot phase and the initial AtC mainstreaming process, as well as ongoing challenges for those implementing and using the AtC process. This section outlines challenges KRCS encountered during the process (and, in some cases, how KRCS was able to overcome those issues), as well as current challenges in the AtC mainstreaming process. In some cases, current challenges are coupled with options for addressing them.

AtC 4 minimum standards / Pillars

The programmatic minimum standards include:

Minimum Standard 1: Transparency **Minimum Standard 2:** Participation

Minimum Standard 3: Complaints and Feedback

Minimum Standard 4: Community-Led Monitoring, Evaluation, and Learning

Emphasis on Feedback Mechanism

The AtC framework includes a set of four minimum standard, which are equally important. In fact, each standard builds upon the others; therefore, effective practice demands an even application of each of the standards into each phase of the program cycle. However, while staff are trained on the entire AtC framework across the program cycle, in practice, much of the effort and emphasis is focused on the feedback mechanism (Minimum Standard 3: Complaints and Feedback). In

particular, staff attention centered on how to establish functioning feedback channels that are based on community preferences and how to respond to inquiries submitted through those channels. This prioritization of the feedback mechanisms has meant that the application of the other minimum standards has been less rigorous. Headquarters staff provided several explanations for why feedback mechanisms remain prioritized:

TIP: Formal approaches are not always superior to the prevailing informal practices employed by staff. In many ways, highlighting the informal application of these pillars, emphasizing how these practices meet the minimum standards, and explaining why this is important is all that is needed.

- 1) The practical application of the three other minimum standards (particularly transparent communication and participation) is far less tangible than the feedback mechanism. While staff conceptually grasp the value of the other standards, they are less concrete and therefore harder to apply.
- 2) There are clear guidelines about feedback mechanisms that provide staff with a straightforward process for implementing this standard throughout the project lifecycle. Several of the pillars of the AtC framework (in particular, transparent communication and participation) however, lack strong guidance or tools for practical application, leaving staff to implement these standards with little guidance. It is important to remember that over-proceduralization can inhibit staff's creativity and ingenuity to problem-solve on the spot in the field. However, general guidance would serve to supplement staff's knowledge and ability to appropriately work on the other minimum standards.
- 3) The setting up of a functioning feedback mechanism was a novel activity for KRCS staff. This therefore required substantial upfront capacity building and education of staff about how a feedback mechanism should work, which created more focus on this standard. In many ways, KRCS field staff already apply the other pillars in their work, although quite informally, which resulted in less attention to these areas in training.

A lack of attention on the other pillars of the AtC framework has meant that, in some cases, these standards are not being applied with much consistency. For example, community members often described a lack of information about KRCS, its programs, its timelines, etc., which could easily be addressed through enhancing processes for transparent communication (described further in Chapter 3).

Options: improving application of minimum standards

- Using its consultative approach, KRCS' MEA&L team could develop guidance documents, tools, or other materials for field staff that would enable them to implement the minimum standards of transparent communication and participation throughout the project lifecycle.
- Building staff capacity and empowering them to see how they are already
 applying these pillars of AtC may also enhance consistent implementation of
 these standards. Undertaking additional trainings or coaching/mentoring of
 field staff about these pillars could be one way to achieve this outcome.

Resourcing & Regional Inconsistencies

For the most part, financial and human resources for the AtC pilot and initial stages of the mainstreaming process were described as successful. However, some aspects related to resourcing ended up creating gaps and inconsistencies across KRCS. While IFRC and PNS provided upfront funding for the initial mainstreaming, this money was largely directed at getting the project underway and was used for onboarding as many staff and volunteers as possible through trainings and dissemination events. Because of limited funding and time constraints of the MEA&L team, these trainings were often too short. Many field staff and volunteers expressed frustration that they were expected to absorb too much information in a short period of time. In addition, CDA observed that KRCS invested heavily on the front-end of the AtC process (i.e. the pilots and the initial roll-out of the mainstreaming process), but perhaps neglected some of the longer-term funding needs required for mainstreaming AtC across the entire organization and its operations.

Currently, in the development phase of new projects, line items related to AtC integration are included in the project budget (e.g. trainings, dissemination events, additional capacity building, and coaching from MEA&L staff, etc.). Long-term projects that were operating prior to the roll-out of the AtC, however, have received far fewer resources for training of staff and mainstreaming activities; sometimes there were no additional resources available at all. This resulted in inconsistencies related to the level of knowledge about AtC and degree of AtC mainstreaming across regional and county offices and, in some cases, between different projects within a single office.

During the visit, CDA was quite impressed by KRCS' creativity in overcoming some of these challenges. Inventive approaches to resourcing were used by regional and MEA&L staff to bring as many staff and volunteers to local trainings. For example, when new projects are launched and an AtC training is undertaken, staff of the new project invited colleagues from other projects to join in order to train more people at the regional level. While effective, this approach occurs in a staggered manner and is highly dependent on new projects timeframes, budgets,

and staff. This ad-hoc approach has left many staff without knowledge or skills relating to AtC.

Options: resourcing of ongoing atc mainstreaming

Mainstreaming the AtC framework is not a one-off process, but rather an ongoing initiative requiring continuous attention. Some of these ongoing activities include: onboarding trainings for new staff, refresher trainings for staff and volunteers, mentoring support for staff and volunteers working on AtC mainstreaming in new programs, refining AtC tools and approaches, and subsequent follow-up trainings and coaching, etc. The following list presents options for KRCS to consider for the resourcing of ongoing AtC mainstreaming activities:

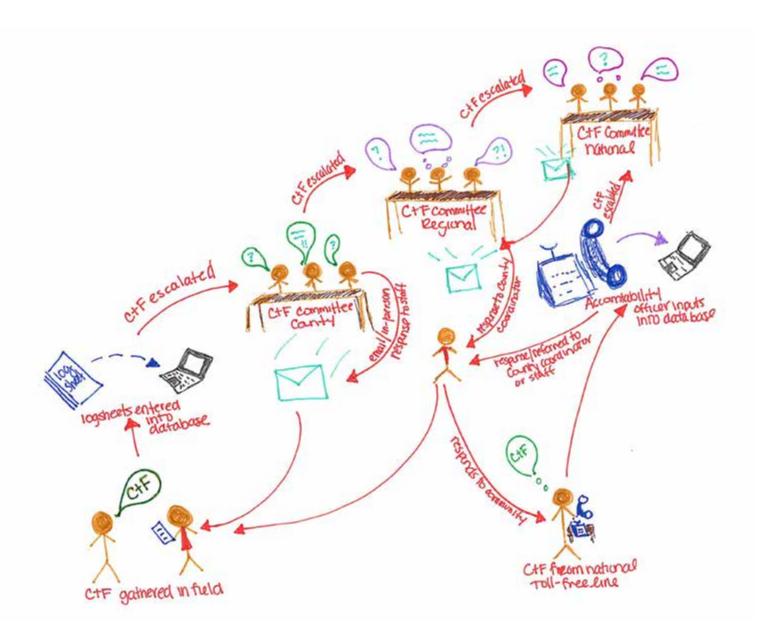
- Consider identifying core funding for the ongoing support of the AtC mainstreaming process as an annual budget line. If accountability is a core value, then KRCS should put the resources required to institutionalize, monitor, and support the ongoing effort.
- Identifying the costs required for institutionalizing and maintaining
 AtC integration is challenging. However, KRCS could conduct a budget
 analysis of the basic line-items associated with the AtC pilot process
 (including staff time, cost of materials, transportation to events, etc.).
 For example, an organizational budget analysis may include:
 - · Costs associated with consultation processes with communities;
 - Relevant staff salaries and time allocated to design/set-up guidance documents, trainings, implementation, and monitoring;
 - Staff and volunteer development budget, including skills trainings, refresher trainings, coaching visits to the field by MEA&L staff, etc.; and
 - 'Hardware' and 'software' costs associated with fully implementing the four standards – e.g. bulletin boards, suggestion boxes, databases, logbooks, data analysis software, etc.

Gaps in the AtC Mainstreaming Process

The following are challenges that were described during process mapping along with possible practical solutions for these gaps. This general feedback about the mainstreaming process included training, cross-departmental collaboration, feedback processes, and management responsibilities over AtC (note: challenges with the nationwide feedback mechanism are described in Chapter Three):

• **Trainings** – In some cases, staff expressed frustrations with the trainings because they discussed the key ideas of the AtC framework but were vague on the "how-to" of practical implementation. Volunteers and project committees noted that, despite efforts to train as many people as possible, too many people were left out of trainings. This has made it hard to have a universal understanding of the importance of AtC across the organization, and even among staff and volunteers within a single regional, county, or sub-county office. In addition, CDA raised the concern about the quality of training content and delivery when training responsibility is delegated beyond the MEA&L team. Ensuring that field staff are appropriately equipped to carry out AtC

- trainings and respond to questions may require a higher level of engagement by the MEA&L team, longer initial trainings, and refresher training opportunities, especially given high-rates of staff turnover.
- Engaging other departments Overall, the high level of engagement of other departments was seen as a success of AtC mainstreaming. However, in discussions at the headquarters office, staff explained that some departments specifically, the finance and internal audit departments could have been engaged much sooner in the process. Program staff felt that while these departments are presently engaged in the AtC process, they have a limited understanding of their role and how the institutionalization of AtC relates to their department. Their engagement from the start, along with more proactive involvement in review processes, could have mitigated some of these issues.
- Feedback process While the consultative approach was praised as largely successful, staff raised some concerns about the process for providing feedback. Staff noted that the process of requesting feedback on materials such as the C&F guidance as well as the AtC framework through email prohibited some staff and many volunteers from providing feedback. Some didn't even realize that they were being asked to be involved in the materials development process. One field staff explained, "Email is not the best way to reach staff. Some staff do not have access to mail, many others don't even have an email address, and volunteers are not on the mailing lists. So, this approach misses important people." KRCS could consider regional, county, and sub-county in-person meetings with staff and volunteers to address this issue in the future.
- Increased involvement in AtC from the organizational development department Managers based at HQ suggested increased involvement by KRCS' organizational development department (OD) in the AtC mainstreaming process may enhance its operationalization. While managers support linking AtC to the program cycle, this model excludes AtC from being mainstreamed in other operational areas, such as membership recruitment. KRCS should consider the inclusion of OD on the AtC leadership team and in the implementation oversight process. This may allow AtC to effectively cut across both programs and operations.



Additional options for AtC enhancement

CDA observed systems and approaches that might create challenges for KRCS in the future if they are not addressed. The section below outlines several options for KRCS to consider as they continue their AtC mainstreaming effort.

- Option: Include Project Exit into Project Lifecycle Currently, the four minimum standards of AtC are presented as key activities within the various phases of the project lifecycle: Stage 1: Project Initiation; Stage 2: Project Planning; Stage 3: Project Implementation; and Stage 4: Project Evaluation. Consider incorporating "Project Exit" as an additional phase of the lifecycle and apply the four minimum standards to this phase. Program closures can be particularly challenging for field staff and community members; therefore, upfront planning is essential to maintain trust and open communication between KRCS and the community.
- Option: Staff Feedback Mechanism (FBM) As one staff member noted, "Accountability should also be for staff. We are part of AtC too." Many staff who spoke with CDA suggested creating a staff FBM. Establishing a staff feedback process could help management to better understand the gaps and challenges faced across the organization. It could also work to improve staff's attitudes and understanding of what a well-functioning feedback loop looks like. CDA has seen staff FBMs effectively shift organizational culture. A staff FBM should include all the same features as a beneficiary FBM. It's important to: 1) ensure that there is a reliable and contextually appropriate channel to provide feedback (including a channel for anonymous feedback), 2) institute a response protocol and timeline for management to review and respond to feedback, and 3) sensitize the staff about how the mechanism works and what they can expect from it.
- Option: Ongoing Reflection and Revision of AtC Since AtC is a continuous process, ensuring that there are moments to pause and review the process is essential. Much like this assessment, KRCS should ensure that they reflect upon the process and capture lessons learned and make modifications when necessary. AtC integration is not a static process, and therefore this type of review is essential for ensuring strong institutional memory.
- Option: Strengthen Staff Assessment Processes CDA was unable to speak
 with the HR team, but staff at HQ explained that the current process for evaluating
 staff on accountability-related indicators either is not strong enough or is not
 occurring with any regularity. Regular review and enforcement of these standards
 by HR and managers can help to address this gap and ensure that these indicators
 work to encourage staff to meet accountability-related performance standards.



Chapter three: nation-wide feedback system

Section 1: Background on the Nation-Wide Feedback Mechanism

During the AtC piloting process, the MEA&L team recognized that KRCS' approach to feedback was insufficient. Therefore, the MEA&L team focused much of their attention on bolstering this pillar of accountability. However, during the field visit, CDA noted discrepancies between staff's perspectives about how the national FBM system worked, including: process, roles and responsibilities, timelines, and tools. Varying perspectives about the nation-wide FBM most likely relate to its relative newness as well as the staggered FBM onboarding and capacity building processes for staff across the agency. This section describes KRCS' internal feedback system and describes discrepancies about the nationwide complaints and feedback system in order to highlight areas where KRCS could work to close gaps between guidance and actual practice.

Community feedback enters KRCS through a number of channels, which are specific to the county branch office. Feedback collected at the field-level is sometimes entered into a logsheet by field staff; however, this practice is not consistent or monitored. On a weekly basis, volunteers and field staff share logsheets with the branch administrator, who consolidates the feedback and categorizes it by program, type of complaint, and resolution (if resolved), which is then entered into the county C&F database (an excel spreadsheet). Weekly, the C&F database is shared with the county C&F committee (including a board member, county coordinator, and a program representative) who reviews feedback entered into the database and identifies issues that need to be responded to. Often, the county C&F committee will meet with the respective project staff about complaints that relate to them and their work, team, project, etc. The county coordinator then responds within three days to the appropriate community members via the channel through which the feedback was originally received. Notably, most staff indicated that responding to

feedback is difficult and does not occur regularly or through consistent and community-selected channels.

Feedback that cannot be addressed at the county level is escalated to the regional branch office through email. At the regional level, the regional C&F committee reviews the feedback and identifies issues that they can respond to. Responses are channeled from the regional committee to the county branch and the county coordinator responds directly to the community within three days. Feedback that cannot be responded to is escalated to the national C&F committee at HQ through email. The HQ committee reviews feedback weekly and also responds within three days.

A national toll-free line is available for all community members. Calls are received through this channel at HQ and are answered by an accountability officer (a member of the national MEA&L team). When possible, the officer responds directly to the feedback; however, when the officer is unable to respond, he/she records it in the national feedback database. Weekly, the accountability officer shares the database with the national C&F committee via email. The national C&F committee responds to feedback by emailing or calling the county coordinators or the appropriate staff. Additionally, the accountability officer develops a monthly report of all feedback data and shares it with the head of the MEA&L department and senior management (see the above diagram to see KRCS' internal referral system).

CDA noted that many of the C&F committees (at the county, regional, and even the national level) either have not been established or are not functioning according to the prescribed process. In addition, response protocols at the national level are obscure to most field staff. Many field staff explained that they did not know how feedback was shared, transferred, or used at the national level. Several staff feared that community feedback about their performance, for example, is discussed by managers and not shared with them. One field staff member explained, "What if someone complains about staff? If that goes directly to headquarters, then we may never hear about it. When it skips the regional level, we feel like they [accountability officer and the national C&F committee] are just a police force."

Section 2: Features of the Nation-Wide Feedback Mechanism & Options for Enhancement

This section details components of that FBM, particularly the national toll-free phone line, and describes its relative strengths and shortcomings. CDA also

provides options for strengthening the feedback mechanism and reinforcing KRCS' standards for feedback collection, response, and utilization.

Complaints & Feedback C&F Guidelines

KRCS' MEA&L staff employed a highly consultative process to ensure that the C&F Guidelines were practical and user-driven. Overall, staff, volunteers, and community members described the process for the Guideline development as successful; many explained that they felt engaged and that their inputs were taken seriously. Development of the Guidelines required volunteers and staff to conduct focus group discussions with communities about preferred channels for feedback collection. Based on those findings, staff at the regional level selected three primary channels to utilize in their programs and operations. After these channels were selected and established, communities were informed about the channels they could use to communicate with KRCS staff and volunteers.

Staff and volunteers explained that the C&F Guidelines provided much-needed instruction about implementing and using a feedback mechanism. However, notable gaps in this process and guidance document were highlighted by research participants and observed by CDA.

Issue	Description	Options for Improvement
Feedback versus Complaints	It was clear that community members and some staff saw the implementation of a feedback mechanism as a system for collection of complaints. In some cases, KRCS does receive positive feedback, and the feedback system should encourage all types of feedback. Sensitizing staff and community members about the types of feedback will be essential for improving the process.	Option: Ensure that communities are informed about their right to provide feedback, and explain that feedback includes complaints as well as suggestions, input, and appreciation. Staff should be made aware of the importance of collecting all forms of feedback. Option: Staff explained that there is confusing institutional language about feedback and complaints. KRCS could work to harmonize the language about feedback across the organization by engaging key internal stakeholders (e.g. BenComms, AtB, AtC, and CEA).
C&F Recommended Channels as "Options"	To develop C&F Guidelines, KRCS asked communities about their preferred channels. Based on these conversations, the final C&F Guidelines provided a set of recommended feedback channels per region. This is a useful reference, but staff should avoid solely relying on initial guidance to select feedback channels for a given community. Information needs and communication preferences of a community may change over time.	Option: Pre-determined channels can ease decision-making processes for staff and allow feedback channels to be established quickly. However, the C&F Guidelines should stress that the channels for feedback listed in the document are only "options" that need to be chosen in consultation with communities. In some cases, channels that were originally listed in the guidance document may become contextually, culturally, or programmatically inappropriate. Staff need to understand that the channels described in the guidance document are options, not dictates. Perhaps instead of guidelines – that need to be followed like a blueprint – KRCS could provide a "menu of options" that includes the pros and cons to each channel. This process would allow staff and communities to select the channels that are most appropriate for them at that time. Option: Include some options in the Guidelines about how to consult communities to ensure that appropriate channels for feedback are selected. New projects should include an assessment process, where field staff test the most appropriate channels with the target population. It is also important to remember that channels for feedback collection can often differ from channels for responding to feedback.

Issue	Description	Options for Improvement
Channels for Sensitive Feedback	Currently, the C&F Guidelines require that the referral of sensitive feedback follows various organizational policies – e.g. code of conduct, SEA, corruption, etc. However, the Guidelines do not explicitly state a specific channel for collecting and responding to sensitive feedback.	Option: Consult communities about the best channels through which they would like to provide sensitive feedback. Establishing several channels for sensitive feedback will enhance access for all clients. If this data was collected, KRCS should review the selected channels and ensure that field staff are implementing channels for sensitive feedback. Option: KRCS should consider issues of confidentiality and anonymity for feedback collection channels, as well as how KRCS will respond to sensitive feedback that is received anonymously.
Review & Reflect	Staff should not see the C&F Guidelines as final and permanent. Humanitarian contexts change quickly, as do community preferences and programmatic objectives.	Option: KRCS' MEA&L team should build in regular periods (perhaps annually) in which to reflect on and review the C&F Guidelines with all stakeholders (HQ staff, field staff, volunteers, and community members in all regions) to ensure that the guidance is still relevant and applicable. When possible, feedback channels should be monitored based on user-engagement and cultural and contextual appropriateness; if changes are made, the MEA&L team should communicate the changes to everyone.

Information Provision

Currently, KRCS shares information with community members through meetings, in-person discussions, and volunteers working in the community. Generally, community awareness about KRCS is limited to the project or activity in which they are participating. As one staff member explained, "We just assume that everyone knows us [KRCS], and we often forget that we aren't special and many communities do not know who we are or what we do." Indeed, in some cases, community members knew little about KRCS, its staff, or the organization's mission. Information provision about the organization is a key pillar of accountability and aids in improving transparent communication between the organization and the communities it serves. When communities have access to information about the organization, it can reduce fears, correct misperceptions, and increase trust.

- **Option:** Use a similar process to that employed when designing the feedback channels. Use a consultative approach to inquire about the channels through which the community would like to receive information. Using an open-ended, iterative process may allow staff to identify new channels that are unique to individual communities. Ensure that this process is inclusive and engages vulnerable populations (paying attention to gender, socio-economic, and other power dynamics). In cases where this information has been collected, ensure that information provision channels are established according to community choice.
- **Option:** Determine the appropriate information provision channels based on community preference and contextual appropriateness in order to communicate important information to communities about KRCS projects, mandate, objectives, mission, as well as the various channels through which the community can provide feedback to KRCS. Ensure that

- there are multiple channels for information provision. A multiplicity of channels will help mitigate challenges related to access and preference.
- Option: Periodically review the functionality of information provision channels as community preferences and the context are constantly evolving. For example, during programmatic reviews and in informal interactions between staff and community project committees, check in to see whether the channels are being used, fit local preferences, and are culturally and contextually appropriate.

Toll-Free Line

As part of the AtC mainstreaming process, KRCS' MEA&L team established a national toll-free line as one of the available feedback channels. KRCS hired an accountability officer to manage the line in Nairobi. This staff member answers roughly five to six calls a day; however, during monthly distributions for the cash transfer program, the officer can receive closer to 15-20 calls a day. When possible, the officer provides an immediate response to questions and feedback; when this is not possible, the officer contacts the appropriate staff member in the field or at HQ and shares the information. This staff member is then responsible for directly following-up and responding to the feedback. Data from the call is recorded and entered into the national database; the officer uses this database on a monthly basis to create analyses of feedback trends and shares them with the MEA&L team and senior management. In addition to the national toll-free line, some of the regional offices provide their own office phone numbers to community members in order to directly respond to feedback from them (this data is generally not shared with the staff running the national toll-free line). While the majority of community members knew about the toll-free line located at KRCS' headquarters, staff across the organization felt that this channel was still new and hadn't yet reached its potential for utility and functionality.

Weakness	Description	Options for Improvement
Field Staff's Knowledge of the Toll-Free Line is Limited	Most field staff explained that they did not know how the phone line functions, who answers the line, how community members receive a response, and how they would know if the line receives a complaint about their program or their team. Field staff largely described the line as a "black hole" for feedback and information.	Option: Ensure that all staff are made aware of how the information gathered via the phone line is used, shared, and addressed. For example, HR could include information about this channel in the onboarding process for new staff. Option: Staff should be introduced to the officer managing the line and be able to talk with this colleague on a regular basis. Consider sending the officer to the field for trainings or workshops so staff can meet him or her.
Limited Capacity of Staff Managing the Phone	Community members who use this line often call and use a local language. The officer on call is sometimes unable to understand the caller because of language barriers. Training was not provided to the officer about basic customer service and phone etiquette.	Option: Ensure that volunteers are available to assist in interpretation when language barriers arise. Option: Provide a training for staff managing the phone-line, which may include: phone etiquette, listening to clients, and managing their requests – including when they are unable to provide a response.

Weakness	Description	Options for Improvement
Responding to Feedback	Calls received by the officer are documented and the information is referred through informal calls or emails between the officer and the relevant staff member. However, the officer is not able to track how, or even if, the feedback is responded to. Sometimes the officer cannot provide a response to a particular question because it is specific to a region or local KRCS activity that the Nairobibased officer is unfamiliar with.	Option: Establish a system for tracking the feedback received from the toll-free line so that the officer can see when steps have been taken to address the issue. This will help in case other people call with similar questions, or the initial caller calls back to ask about the status of his/her feedback. Option: Consider having a regional or branch toll-free phone line which is answered by a "neutral" KRCS staff member, such as a regional reporting officer. If this isn't possible, have regional teams prepare periodic briefings (e.g. frequently asked questions (FAQs) and other pertinent information, including information about partners, their services, and contact information) for the officer managing the phone line. FAQs could also be shared with program staff and volunteers to help with consistency.
Multiple Lines Create Confusion	Staff and community members appreciated having one phone line at the regional level and one phone line at the national level. However, many could not distinguish the difference or know what to expect from each line. Often, this created confusion for community members about the purpose and role of the line and why there were two lines.	Option: Use strong information provision channels, such as noticeboards or community meetings, to explain the different lines, share the phone numbers, and explain what community members can expect from each line. Option: With staff and community members, consider evaluating the utility of having two lines, and which line would meet community needs more appropriately. KRCS should be open and flexible to the possibility of eliminating one of the lines if necessary.
Reporting Process	Feedback data is consolidated monthly by the accountability officer and shared with the MEA&L team and senior management. Largely, field staff are unaware of the general feedback trends. If the issues do not relate to their offices or program activities, they do not receive any information about feedback from the toll-free line. Many field staff said that they would appreciate more information about feedback from the line. Staff explained that they were fearful that if complaints came in through the line about them, they would not be informed, and it could have implications on their jobs.	Option: Program managers at HQ indicated that they would like to access the data, so they can use it to search for trends, develop proposals, and monitor the challenges on the ground. Consider making the feedback database (with all identifying information removed) available to managers at HQ. Option: Consider developing an anonymized monthly report (e.g. implementing monthly C&F reports) that can be shared with all staff about what data was received by the call-line, from where, how it was responded to. This report needs to consider any potential sensitivities and competitions between KRCS programs. However, such a report might enhance staff confidence in this channel, provide them with greater insight into how it works, and allow teams to see similarities in issues across counties in order to share solutions.

Internal System

The C&F Guidelines also established an internal system for managing feedback. Consistent, reliable, and transparent institutional processes for receiving, analyzing, using, and responding to community feedback are essential for an effective feedback mechanism. When feedback is addressed and used in an ad hoc manner based on individual personalities and priorities, it can create disparities across the organization. At KRCS, feedback is not consistently documented, particularly when field staff do not have the appropriate answer or too much time elapses between gathering the feedback and drafting the monthly report.

• **Option:** While the C&F Guidelines might set thresholds regarding when and how information and community feedback data should be escalated to the next level within the organization, staff are either not aware of this process or are not implementing it appropriately.¹²

Train staff on the thresholds and timelines set in the Guidelines. Enhancing the use of these established processes may require strengthening the C&F Committees at all levels (see below) as well as increasing oversight, monitoring, and support of the process.

- **Option:** Ensure that field staff and volunteers have and use logbooks when they are in the field. Provide clear instructions through trainings or amendments to the C&F Guidelines for recording feedback (which may include date, location, type of feedback, etc.). Ensure that this data is shared regularly (perhaps more frequently than in a monthly report) so it can be put into the feedback database. Establish a predictable timeline for how frequently the logbooks will be collected and reviewed.
- **Option:** Consider providing feedback registration training for staff and volunteers to ensure that data collected is appropriately entered into the feedback database. Establish a predictable timeline for how frequently the logbooks will be collected and reviewed.
- **Option:** While KRCS has feedback databases at each level of the organization, it might be useful to develop an organization-wide feedback database that will log all feedback in one place. This database will allow staff to analyze feedback trends, so the information can be used to make program adaptations, facilitate course corrections, and enhance future project proposals.

C&F Committees at the county, regional, and national level were described as useful for addressing feedback that staff were unable to respond to. However, they are not used systematically across the organization.

TIP: Be careful to not over-proceduralize feedback processes. Create a balance between capturing enough data and empowering staff to make decisions quickly and think creatively.

 Option: KRCS' MEA&L staff could consider county, regional, and national-level trainings about the committees, their role and responsibility of the committee, and the thresholds set in the C&F Guidelines for reviewing, responding to, verifying, and escalating feedback. Regular check-ins between MEA&L staff and these committees may also help to ensure that they are working and can offer an opportunity for the MEA&L team to provide some coaching.

Responding to Feedback

In its current form, the feedback system has several gaps in terms of ensuring that feedback receives an appropriate and timely response. 'Closing the loop' is critical for functioning feedback mechanisms, yet it is often the most challenging aspect of accountability systems for staff. When feedback is not responded to, it can weaken trust between the community and KRCS. Currently, KRCS does not have consistent channels through which community members can expect to receive a respond to their feedback. Community members, and, in some cases, staff, are unclear about how long it would take to get a response to feedback.

- **Option:** Consider using a similar approach as listed in the table referencing information provision process (page 22).¹³
- **Option:** Establish protocols for response timeframes and share these protocols with the community. In some cases, these protocols have been established by the AtC framework; however, the guidelines are not being followed or enforced. MEA&L staff should work with staff through trainings, coaching, and capacity building sessions to support field staff's understanding of the protocols.
- **Option:** Ensure that response protocols are appropriate to the local context. Response timeframes and channels for response can vary based on the type of feedback (non-sensitive, sensitive, and general feedback) and should be decided upon by staff, management, volunteers, and community members. Ensure that the protocols outline a timeframe for response at each level of the organization in order to improve the response time between field staff and management. Response protocols should also be realistic, flexible, and based upon the practical realities of operating in the Kenyan context. The most important feature of response is creating and maintaining clear lines of communication

Use a consultative approach to inquire about the channels through which community members would like to receive a response to their inquiries and feedback. Remember to ask about channels through which KCRS can respond to sensitive feedback. Using an open-ended, iterative process may allow staff to identify new channels that are unique to individual communities. Ensure that this process is inclusive and engages vulnerable populations (remember gender and power dynamics). Institute multiple channels for response, including channels for responding to sensitive and non-sensitive feedback. A multiplicity of channels will help mitigate challenges related to access and preference. Ensure at least one, but preferably several, channel(s) are established for responding to sensitive feedback. Remember that the channels should be able to respond to sensitive information that is received anonymously. Inform the community about the channels through which they will be receiving response to their inquiries and feedback. Ensure that staff and volunteers also understand the purpose of these channels and feel confident explaining them to community members. Consider including response channels in AtC trainings and in on-boarding of new staff. Periodically review the functionality of response channels. Community preferences evolve, as does the humanitarian context, so it is important to review with communities if the mechanisms are still relevant as well as culturally and contextually appropriate.

with the community, so they are aware of the process and understand how, from whom, and when they might hear back from KRCS.

Field staff explained that they did not always see the significance of responding to feedback or found it too difficult to respond because 1) too much time had elapsed since the feedback was given, 2) reaching the person was difficult, or 3) the feedback was provided anonymously. In addition, field staff explained that when feedback was not related to them (often called unsolicited feedback), or when it was negative in nature, they did not know how to respond to it.

TIP: Remember that community members often prefer different channels for collection and response.

- **Option**: Include response practices in AtC trainings and during coaching visits to reinforce staff skills on how to gather, use, and respond to unsolicited and negative feedback. Ensure that this training includes information about what role unsolicited and negative feedback plays in relation to field staff's work. Include coaching for staff about how to give unsatisfactory responses (responses that give someone an answer other than what they were likely hoping for).
- **Option:** Develop a guidance document that outlines what feedback staff can respond to and what feedback they cannot respond to (which might require an external referral). Ensure that staff are included in the development of this guidance and issues such as staff code of conduct and behavior are considered.

Commonly, staff explained that they receive the same questions to which they were often not equipped to appropriately respond.

• **Option:** Compile frequently asked questions (FAQs) that come from community members. Work with staff and volunteers to determine consistent responses to these questions. Disseminate FAQs to field staff, volunteers, and project committee leaders so they can be ready to provide up-to-date, relevant information and answer questions. If noticeboards are used, post FAQs on them so that community members can have a reference point. Update FAQs periodically as new questions and issues arise from feedback channels.



Chapter four: lessons for IFRC & other National Societies

Fundamentally, each National Society operates with relative autonomy and faces distinct operational, programmatic, and contextual constraints and opportunities. Therefore, there is no "cookie-cutter" approach to mainstreaming AtC across the entire Movement. Key lessons from KRCS' experience, however, can perhaps provide insight into the factors that led to their largely successful process. These insights can help provide a general "road map" for IFRC and other National Societies seeking to mainstream AtC within their programs and operations.

Piloting Phase

Across KRCS, staff explained that launching AtC as a pilot in one project in one subcounty office was a useful starting point for the mainstreaming process. Through its pilot, KRCS was able to test processes and systems and adapt them before rolling them out across all programs and operations. In addition, piloting allowed for a gradual onboarding and sensitization process for staff and volunteers. This might have helped improve overall understanding of the pillars of accountability, as well as staff and volunteers' roles and responsibilities in relation to these pillars. Using a pilot as a way to test the IFRC's tools and guidance for AtC mainstreaming allowed KRCS to make the appropriate contextual modifications, so the process was "fit" for the Kenyan context and operating environment.

The timeline for the pilot is also an important consideration for other NS considering this approach. While KRCS' staff appreciated the length of the pilot period (six months), many noted that it should have been longer. A longer pilot period might have allowed for additional testing and adaptation to key approaches. Furthermore, additional time for the pilot could have allowed more staff to participate in the AtC onboarding process. This may have provided staff with a deeper understanding and generated more buy-in for the longer-term objective of mainstreaming AtC across all KRCS' operations and programs.

Flexibility & Adaptability

Staff, volunteers, and community members noted that KRCS' willingness to be flexible and adapt its processes was essential to both the pilot and larger main-streaming effort's success. While guidelines and frameworks were developed at the beginning of the initiative, these were all modified based on input and feedback.

For example, recognition of the unique features of KRCS' regional offices allowed for feedback channels that are tailored to the specific communities served in that region. A consultative pilot process enabled KRCS to avoid rigid protocols and bureaucracy.

Shared Responsibility Early in the Process

Strategically, the MEA&L team sought to ensure that AtC was seen as an institutional process and not an MEA&L task. They did this by engaging staff across the organization early on in the AtC pilot phase and again during the AtC mainstreaming design and planning stages. MEA&L staff requested staff involvement in key areas such as: 1) selecting the piloting locations, 2) giving feedback for the development of frameworks and guidelines, 3) and determining how AtC principles fit within their departments. The ultimate test of buy-in and trust was when the MEA&L team eventually handed over new AtC training opportunities to field and program staff. Involving staff early and throughout the process accomplished the following: it 1) enhanced staff's understanding of the significance of the AtC process, 2) highlighted how AtC was not a new endeavor and was in fact closely linked to how programs were already being implemented, and 3) strengthened relations between MEA&L and field staff, which allowed them to work more closely and collaboratively.

The involvement of KRCS' communities early on in the process should also not be overlooked. All staff and volunteers felt that the early engagement of community members in discussions about these new approaches to accountability helped to ensure the process was inclusive and dictated by the communities KRCS is serving. Community feedback directly fed into the AtC framework and the C&F Guidelines, which should make these resources more practical and usable in the field.

Organizational Prioritization

As noted in Chapter 2, the roll-out of KRCS' AtC process fortuitously came at time in which the agency was re-evaluating its priorities and core values in order to develop a new strategic plan. This timing enabled the organization to integrate accountability (as framed by the AtC tools) into all of its programs and policies, highlighting it as an agency-wide priority. Accountability was also brought into other key evaluative processes, such as staff key performance indicators. While this may not always be possible for other NS, finding ways to link AtC to other larger strategic goals and values can increase staff's awareness of its significance and help to ease the mainstreaming process.

Furthermore, KRCS' success can also be attributed to the high level of engagement and prioritization it received from the organization's senior leadership. Senior leaders were engaged early in the process, provided ongoing input, and were seen to be invested and involved in both the pilot and mainstreaming of AtC. AtC was

truly championed by the Deputy Secretary General (DSG) and other senior leaders, which demonstrated the organizational commitment to the pillars of accountability and encouraged staff to prioritize the initiative.

Linking AtC to the Program Cycle

As described in the "success" section of Chapter 2, linking the AtC process to the program cycle was an extremely useful tactic for an AtC mainstreaming process. Integrating the minimum standards into key elements in each phase of the project lifecycle made it easier for KRCS staff to think about and act on them. Furthermore, it enabled program staff to see 1) the direct outcomes of increased accountability as it related to their own work, and 2) that accountability was a tool and process that they were already employing in their work. Directly linking AtC to staff's day-to-day responsibilities made sense, was practical, and therefore was more successful. This also alleviated many program staff's fears that AtC was a "new" approach being forced on them by MEA&L HQ staff.

Strong Training & Effort of MEA<eam

Well-designed and robust trainings about AtC, provided by staff who are versed in accountability and strong facilitators, was a key feature of KRCS' success. Staff, volunteers, and community project committees unanimously agreed that that the carefully-planned and executed trainings were one of the most important factors behind the success of the project. The success was due to both the quality and quantity of the trainings. The quality of training was described as an essential consideration in the AtC mainstreaming process. In addition, by casting a wide net and training as many staff, volunteers, and community members as possible, the MEA&L team was able to advance AtC as an institution-wide initiative. One field staff member explained, "Training everyone, including the community, is important because it builds trust." The more stakeholders were engaged, the more apparent it became that AtC was everyone's responsibility, and not just an MEA&L task.

It is important to note that while the AtC mainstreaming process was largely successful, it required an enormous amount of effort on the part of the MEA&L team. The MEA&L team spent a significant amount of time on tasks such as continuous follow-up with staff, responding to questions and offering support, and requesting staff reports related to AtC. Staff time is often overlooked when planning accountability systems. The KRCS example demonstrates the importance of being aware of staff time and effort.

While KRCS located AtC oversight responsibilities within the MEA&L department, other NS may position their AtC management within other departments, such as communications or organizational development. Identifying the appropriate location for AtC oversight is highly dependent on the individual NS, its programs, systems, and processes for managing its operations, and where the appropriate resources

(both financial and human resources) are located. In some cases, NS could consider undertaking an institutional analysis to better determine where to situate AtC.

Institutional Analysis

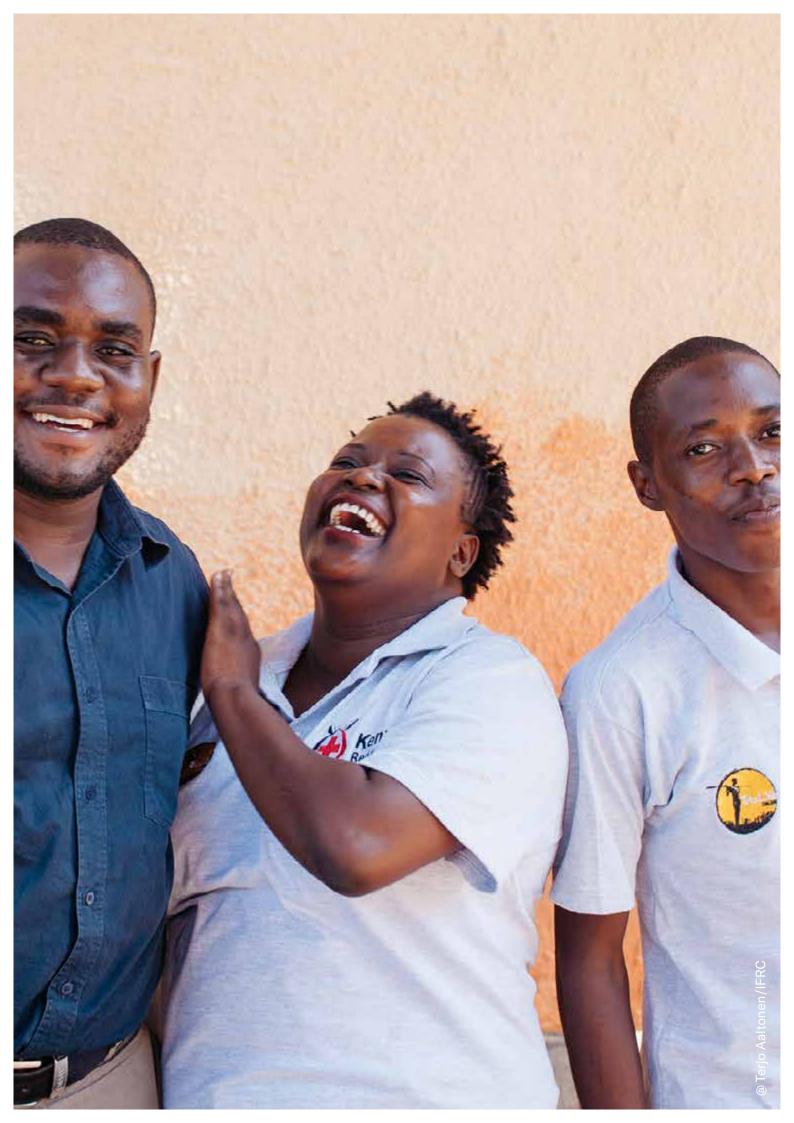
An institutional analysis could be very useful in identifying which department(s) have the capacities, skills, and the ability to manage accountability and feedback processes. Analysis should provide a clear picture of internal information-sharing pathways and decision-making processes at county, regional, and national levels. The decision on where to anchor accountability functions is important and carries implications for effectiveness and impact of AtC.

Dedicated Resources

Arguably, the pilot and initial roll-out of KRCS' AtC mainstreaming process were as effective as they were because a separate set of resources were allocated to them. Adequate resourcing of AtC meant that there were dedicated staff who had the appropriate skills to manage the process, and that the necessary financial resources were available for the larger roll-out and onboarding of all stakeholders. Effectively resourcing the AtC process from the beginning enabled the MEA&L team to involve a large number of stakeholders and introduce AtC throughout the organization. To date, some of the largest gaps and challenges faced by KRCS in the ongoing mainstreaming process are linked directly to a lack of adequate resources for continued activities. Building AtC mainstreaming into the organization's operating budget as an independent set of activities (dissemination events, trainings, coaching and mentoring, refresher workshops, on-boarding of new staff, etc.) can help to address the challenge of an under-funded mainstreaming process.

Reflection & Review

Establishing periodic opportunities to review the pilot and the mainstreaming initiative enabled KRCS to document key lessons and make alterations. Building in review time from the start is essential. A program staff member explained, "A clear monitoring plan for AtC needs to be made from the beginning. We need to have reflection points so we can ask ourselves: 'what did we want to do? what are we doing?'" Importantly, accountability is an ongoing process and not a one-time initiative; therefore, it needs to be periodically evaluated and revised to guarantee that it meets its objectives in a contextually and operationally appropriate way. Reflection moments serve as appropriate times to review how guidelines, tools, and frameworks are being operationalized in order to ensure that they are effective and used. It is important to include all stakeholders in some part of this review process, and equally important to share the findings of these reviews widely across the organization.



Chapter five: conclusion

This operational case study highlights KRCS' experience mainstreaming AtC across all its programs and operations. Fundamentally, KRCS' undertaking of AtC integration can be described as a successful effort. Specifically, this process helped to embed accountability into the organization's core values and elevated the importance of accountability across the organization. The intentionality and deliberate nature of this process was key to its success. It was the MEA&L team's advanced thinking about 'why' and 'how' to effectively mainstream accountability that allowed for the broad acceptance of the initiative.

Furthermore, support (both financial support and capacity building) from IFRC and Partner National Societies helped to ensure that the process had the appropriate technical expertise and resources in order to ensure uptake. External support combined with internal promotion and endorsement (particularly by senior management) set a tone about the importance of accountability throughout the organization. This helped encourage staff and volunteers to take the process seriously and to get involved early and often. AtC was also rolled out in a way that mandated broad ownership by all staff, volunteers, and community members, which ensured high-levels of engagement by everyone. Collective ownership for the AtC process has engendered a collective success of the initiative.

Shifting to a more robust criterion for accountability – one that is collectively owned and practiced – has led to better projects and operational outcomes. Stronger participation, trust, and relationships between KRCS and its communities has created a greater sense of security for staff and volunteers, more contextually-appropriate projects, and higher levels of community ownership and resiliency. In the long-run, AtC mainstreaming has helped KRCS to reach its goals of improving program quality, reducing local vulnerabilities, and building safe and resilient communities.

However, even with KRCS's significant success, accountability is not a one-time endeavor. KRCS will benefit from continued review and reflection of its AtC tools, guidance, frameworks, and practices in order to ensure that they remain relevant and appropriate. If KRCS maintains its collective commitment to and robust practices of accountability, the organization is likely to see great achievement in this area for years to come.

Annexes

Annex 1: MEA&L team, KRCS 2017

The following staff are/were responsible for leading and managing KRCS' AtC Mainstreaming process:

- · Lydia Atiema, Head of MEA&L Department
- · Januarius Obongita, MEA&L Officer
- · Rehema Mbete, MEA&L Officer
- · Verah Nyaura, MEA&L Officer
- · Patrick Gitahi, MEA&L Officer
- Daniel Wanyoike, MEA&L Officer
- · Rita Njuguna, Accountability Officer
- Suleiman Mohammed, Grants Officer
- · Reuben Onkoba, Data Manager

Annex 2: list of options for KRCS' AtC Enhancement

Improving Application of Minimum Standards

- **Option:** Using its consultative approach, KRCS' MEA&L team could develop guidance documents, tools, or other materials for field staff that would enable them to implement the minimum standards of transparent communication and participation throughout the project lifecycle.
- Option: Building staff capacity and empowering them to see how they are already applying these pillars of AtC may also enhance consistent implementation of these standards. Undertaking additional trainings or coaching/mentoring of field staff about these pillars could be one way to achieve this outcome.

Resourcing of Ongoing AtC Mainstreaming Activities

• **Option:** Consider identifying core funding for the ongoing support of the AtC mainstreaming process as an annual budget line. If

- accountability is a core value, then KRCS should put the resources required to institutionalize, monitor, and support the ongoing effort.
- **Option:** Identifying the costs required for institutionalizing and maintaining AtC integration is challenging. However, KRCS could conduct a budget analysis of the basic line-items associated with the AtC pilot process (including staff time, cost of materials, transportation to events, etc.). For example, an organizational budget analysis may include:
 - · Costs associated with consultation processes with communities;
 - Relevant staff salaries and time allocated to design/set-up guidance documents, trainings, implementation, and monitoring;
 - Staff and volunteer development budget, including skills trainings, refresher trainings, coaching visits to the field by MEA&L staff, etc.; and
 - · 'Hardware' and 'software' costs associated with fully implementing the four standards e.g. bulletin boards, suggestion boxes, databases, logbooks, data analysis software, etc.

General Options for AtC Enhancement

- Option: Include Project Exit into Project Lifecycle Currently, the four minimum standards of AtC are presented as key activities within the various phases of the project lifecycle: Stage 1: Project Initiation; Stage 2: Project Planning; Stage 3: Project Implementation; and Stage 4: Project Evaluation. Consider incorporating "Project Exit" as an additional phase of the lifecycle and apply the four minimum standards to this phase. Program closures can be particularly challenging for field staff and community members; therefore, upfront planning is essential to maintain trust and open communication between KRCS and the community.
- Option: Staff Feedback Mechanism (FBM) As one staff member noted, "Accountability should also be for staff. We are part of AtC too." Many staff who spoke with CDA suggested creating a staff FBM. Establishing a staff feedback process could help management to better understand the gaps and challenges faced across the organization. It could also work to improve staff's attitudes and understanding of what a well-functioning feedback loop looks like. CDA has seen staff FBMs effectively shift organizational culture. A staff FBM should include all the same features as a beneficiary FBM. It's important to: 1) ensure that there is a reliable and contextually appropriate channel to provide feedback (including a channel for anonymous feedback), 2) institute a response protocol and timeline

- for management to review and respond to feedback, and 3) sensitize the staff about how the mechanism works and what they can expect from it.
- Option: Ongoing Reflection and Revision of AtC Since AtC is a continuous process, ensuring that there are moments to pause and review the process is essential. Much like this assessment, KRCS should ensure that they reflect upon the process and capture lessons learned and make modifications when necessary. AtC integration is not a static process, and therefore this type of review is essential for ensuring strong institutional memory.
- Option: Strengthen Staff Assessment Processes CDA was unable to speak with the HR team, but staff at HQ explained that the current process for evaluating staff on accountability-related indicators either is not strong enough or is not occurring with any regularity. Regular review and enforcement of these standards by HR and managers can help to address this gap and ensure that these indicators work to encourage staff to meet accountability-related performance standards.

Nation-Wide Feedback vMechanism

C&F Guidelines

Feedback versus Complaint

- Option: Ensure that communities are informed about their right to provide feedback, and explain that feedback includes complaints as well as suggestions, input, and appreciation. Staff should be made aware of the importance of collecting all forms of feedback.
- **Option:** Staff explained that there is confusing institutional language about feedback and complaints. KRCS could work to harmonize the language about feedback across the organization by engaging key internal stakeholders (e.g. BenComms, AtB, AtC, and CEA).

C&F Recommended Channels as "Options"

• **Option:** Pre-determined channels can ease decision-making processes for staff and allow feedback channels to be established quickly. However, the C&F Guidelines should stress that the channels for feedback listed in the document are only "options" that need to be chosen in consultation with communities. In some cases, channels that were originally listed in the guidance document may become contextually, culturally, or programmatically inappropriate. Staff need to understand that the channels described in the guidance document are options, not dictates. Perhaps instead of guidelines – that need to be followed like a blueprint – KRCS could provide a "menu of options" that includes the pros and

- cons to each channel. This process would allow staff and communities to select the channels that are most appropriate for them at that time.
- **Option:** Include some options in the Guidelines about how to consult communities to ensure that appropriate channels for feedback are selected. New projects should include an assessment process, where field staff test the most appropriate channels with the target population. It is also important to remember that channels for feedback collection can often differ from channels for responding to feedback.

Channels for Sensitive Feedback

- **Option:** Consult communities about the best channels through which they would like to provide sensitive feedback. Establishing several channels for sensitive feedback will enhance access for all clients. If this data was collected, KRCS should review the selected channels and ensure that field staff are implementing channels for sensitive feedback.
- Option: KRCS should consider issues of confidentiality and anonymity for feedback collection channels, as well as how KRCS will respond to sensitive feedback that is received anonymously.

Review & Reflect

• **Option:** KRCS' MEA&L team should build in regular periods (perhaps annually) in which to reflect on and review the C&F Guidelines with all stakeholders (HQ staff, field staff, volunteers, and community members in all regions) to ensure that the guidance is still relevant and applicable. When possible, feedback channels should be monitored based on user-engagement and cultural and contextual appropriateness; if changes are made, the MEA&L team should communicate the changes to everyone.

Information Provision

- **Option:** Use a similar process to that employed when designing the feedback channels. Use a consultative approach to inquire about the channels through which the community would like to receive information. Using an open-ended, iterative process may allow staff to identify new channels that are unique to individual communities. Ensure that this process is inclusive and engages vulnerable populations (paying attention to gender, socio-economic, and other power dynamics). In cases where this information has been collected, ensure that information provision channels are established according to community choice.
- **Option:** Determine the appropriate information provision channels based on community preference and contextual appropriateness in order to communicate important information to communities about KRCS

- projects, mandate, objectives, mission, as well as the various channels through which the community can provide feedback to KRCS. Ensure that there are multiple channels for information provision. A multiplicity of channels will help mitigate challenges related to access and preference.
- Option: Periodically review the functionality of information provision channels as community preferences and the context are constantly evolving. For example, during programmatic reviews and in informal interactions between staff and community project committees, check in to see whether the channels are being used, fit local preferences, and are culturally and contextually appropriate.

Toll-Free Line

Field Staff's Knowledge of the Toll-Free Line is Limited

- **Option:** Ensure that all staff are made aware of how the information gathered via the phone line is used, shared, and addressed. For example, HR could include information about this channel in the onboarding process for new staff.
- **Option:** Staff should be introduced to the officer managing the line and be able to talk with this colleague on a regular basis. Consider sending the officer to the field for trainings or workshops so staff can meet him or her.

Limited Capacity of Staff Managing the Phone

- **Option:** Ensure that volunteers are available to assist in interpretation when language barriers arise.
- Option: Provide a training for staff managing the phone-line, which
 may include: phone etiquette, listening to clients, and managing their
 requests including when they are unable to provide a response.

Responding to Feedback

- **Option:** Establish a system for tracking the feedback received from the toll-free line so that the officer can see when steps have been taken to address the issue. This will help in case other people call with similar questions, or the initial caller calls back to ask about the status of his/her feedback.
- **Option:** Consider having a regional or branch toll-free phone line which is answered by a "neutral" KRCS staff member, such as a regional reporting officer. If this isn't possible, have regional teams prepare periodic briefings (e.g. frequently asked questions (FAQs) and other pertinent information, including information about partners, their services, and contact

information) for the officer managing the phone line. FAQs could also be shared with program staff and volunteers to help with consistency.

Multiple Lines Create Confusion

- **Option:** Use strong information provision channels, such as noticeboards or community meetings, to explain the different lines, share the phone numbers, and explain what community members can expect from each line.
- **Option:** With staff and community members, consider evaluating the utility of having two lines, and which line would meet community needs more appropriately. KRCS should be open and flexible to the possibility of eliminating one of the lines if necessary.

Reporting Process

- Option: Program managers at HQ indicated that they would like to access the data, so they can use it to search for trends, develop proposals, and monitor the challenges on the ground. Consider making the feedback database (with all identifying information removed) available to managers at HQ.
- **Option:** Consider developing an anonymized monthly report (e.g. implementing monthly C&F reports) that can be shared with all staff about what data was received by the call-line, from where, how it was responded to. This report needs to consider any potential sensitivities and competitions between KRCS programs. However, such a report might enhance staff confidence in this channel, provide them with greater insight into how it works, and allow teams to see similarities in issues across counties in order to share solutions.

Internal System

Option: While the C&F Guidelines might set thresholds regarding when and how information and community feedback data should be escalated to the next level within the organization, staff are either not aware of this process or are not implementing it appropriately.¹⁴ Train staff on the thresholds and timelines set in the Guidelines. Enhancing the use of these established processes may require

- strengthening the C&F Committees at all levels (see below) as well as increasing oversight, monitoring, and support of the process.
- **Option:** Ensure that field staff and volunteers have and use logbooks when they are in the field. Provide clear instructions through trainings or amendments to the C&F Guidelines for recording feedback (which may include date, location, type of feedback, etc.). Ensure that this data is shared regularly (perhaps more frequently than in a monthly report) so it can be put into the feedback database. Establish a predictable timeline for how frequently the logbooks will be collected and reviewed.
- **Option:** Consider providing feedback registration training for staff and volunteers to ensure that data collected is appropriately entered into the feedback database. Establish a predictable timeline for how frequently the logbooks will be collected and reviewed.
- Option: While KRCS has feedback databases at each level of the organization, it might be useful to develop an organizationwide feedback database that will log all feedback in one place. This database will allow staff to analyze feedback trends, so the information can be used to make program adaptations, facilitate course corrections, and enhance future project proposals.
- Option: KRCS' MEA&L staff could consider county, regional, and national-level trainings about the committees, their role and responsibility of the committee, and the thresholds set in the C&F Guidelines for reviewing, responding to, verifying, and escalating feedback. Regular check-ins between MEA&L staff and these committees may also help to ensure that they are working and can offer an opportunity for the MEA&L team to provide some coaching.

Responding to Feedback

- **Option:** Consider using a similar approach as listed in the table referencing information provision process (page 22). 15
- **Option:** Establish protocols for response timeframes and share these protocols with the community. In some cases, these protocols have

Use a consultative approach to inquire about the channels through which community members would like to receive a response to their inquiries and feedback. Remember to ask about channels through which KCRS can respond to sensitive feedback. Using an open-ended, iterative process may allow staff to identify new channels that are unique to individual communities. Ensure that this process is inclusive and engages vulnerable populations (remember gender and power dynamics). Institute multiple channels for response, including channels for responding to sensitive and non-sensitive feedback. A multiplicity of channels will help mitigate challenges related to access and preference. Ensure at least one, but preferably several, channel(s) are established for responding to sensitive feedback. Remember that the channels should be able to respond to sensitive information that is received anonymously. Inform the community about the channels through which they will be receiving response to their inquiries and feedback. Ensure that staff and volunteers also understand the purpose of these channels and feel confident explaining them to community members. Consider including response channels in AtC trainings and in on-boarding of new staff. Periodically review the functionality of response channels. Community preferences evolve, as does the humanitarian context, so it is important to review with communities if the mechanisms are still relevant as well as culturally and contextually appropriate.

- been established by the AtC framework; however, the guidelines are not being followed or enforced. MEA&L staff should work with staff through trainings, coaching, and capacity building sessions to support field staff's understanding of the protocols.
- **Option:** Ensure that response protocols are appropriate to the local context. Response timeframes and channels for response can vary based on the type of feedback (non-sensitive, sensitive, and general feedback) and should be decided upon by staff, management, volunteers, and community members. Ensure that the protocols outline a timeframe for response at each level of the organization in order to improve the response time between field staff and management. Response protocols should also be realistic, flexible, and based upon the practical realities of operating in the Kenyan context. The most important feature of response is creating and maintaining clear lines of communication with the community, so they are aware of the process and understand how, from whom, and when they might hear back from KRCS.
- Option: Include response practices in AtC trainings and during coaching visits to reinforce staff skills on how to gather, use, and respond to unsolicited and negative feedback. Ensure that this training includes information about what role unsolicited and negative feedback plays in relation to field staff's work. Include coaching for staff about how to give unsatisfactory responses (responses that give someone an answer other than what they were likely hoping for).
- **Option:** Develop a guidance document that outlines what feedback staff can respond to and what feedback they cannot respond to (which might require an external referral). Ensure that staff are included in the development of this guidance and issues such as staff code of conduct and behavior are considered.
- **Option:** Compile frequently asked questions (FAQs) that come from community members. Work with staff and volunteers to determine consistent responses to these questions. Disseminate FAQs to field staff, volunteers, and project committee leaders so they can be ready to provide up-to-date, relevant information and answer questions. If noticeboards are used, post FAQs on them so that community members can have a reference point. Update FAQs periodically as new questions and issues arise from feedback channels.



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Impartiality It makes no discrimination as to nationality, race, religious beliefs, class or political opinions. It endeavours to relieve the suffering of individuals, being guided solely by their needs, and to give priority to the most urgent cases of distress.

Neutrality In order to enjoy the confidence of all, the Movement may not take sides in hostilities or engage at any time in controversies of a political, racial, religious or ideological nature.

Independence The Movement is independent. The National Societies, while auxiliaries in the humanitarian services of their governments and subject to the laws of their respective countries, must always maintain their autonomy so that they may be able at all times to act in accordance with the principles of the Movement.

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