



**A comprehensive analysis of
inclusive feedback and complaint
handling mechanism among
people with disabilities**

Case study of Gazans

Gaza - Palestine September 2021

صندوق الشكاوى
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Introduction

Islamic Relief is a faith-inspired organisation committed to professionalism and the highest standards of excellence in the protection, health and wellbeing of our target populations of all gender, ages and abilities.

Islamic Relief staff and representatives are accountable to our Creator in everything that we do. To our supporters for the ways in which we use and achieve the most effective humanitarian impact from their contributions; and to our target populations for providing equitable and accessible assistance safely and in a dignified manner, ensuring that humanitarian interventions 'Do no harm' and 'Leave no one behind'. Our ethics, policies and procedures represent the basic standards to which we are held accountable.

Our actions are inspired by and grounded in our Islamic values: excellence, sincerity, social justice, compassion and custodianship. Commitment to feedback and complaint handling mechanisms make up one of the five pillars of Islamic Relief's Accountability Framework. This framework holds us responsible for ensuring women, men, girls and boys of all ages and abilities, including children, young people and people at risk, are protected against all forms of harm and abuse, including, in particular, violence, gender-based violence (GBV), sexual exploitation and abuse. Islamic Relief is also responsible for ensuring that its staff and volunteers are protected against the risk of harm and abuse.

Islamic Relief believes everyone has the right to be safe, respected and valued, regardless of who they are or their circumstances. A key tenet of our values and humanitarian approach is to ensure that staff, volunteers, our operations and programmes do no harm to target populations in need. We also make sure we provide populations and our staff the right and opportunity to highlight inadequacies in our service, enabling us to improve and address any injustice or inefficiency in our work.

Any concerns that Islamic Relief staff or representatives have regarding their safety or the safety of women, men, girls, boys, children, young people and people at risk should be reported using the various complaints mechanisms and procedures that Islamic Relief has in place.

Since 2008, Islamic Relief Palestine has received support from the Swedish International Development Cooperation Agency (Sida) towards enhancing the protection and resilience of affected populations in the Gaza Strip, by providing temporary jobs for both female and male graduates and household breadwinners through cash-for-work programming.

Since 2014, protection mainstreaming and inclusion has been prioritised by Islamic Relief Palestine and represents a key requirement by Sida across all levels of programming and implementation, with a particular focus on the empowerment of rights-holders and safeguarding to ensure humanitarian interventions 'Do no harm' and 'Leave no one behind'. As part of this focus, Islamic Relief Palestine have committed to ensure people have equal access to safe and responsive feedback and complaints mechanisms, to freely express their level of satisfaction and any concerns regarding all aspects of the support they receive from humanitarian programming.

Establishing an inclusive feedback and complaint handling mechanism is a commitment at the organisational level to include local communities in feedback and complaints processes, to close the protection gap and ensure that persons with disabilities (PWDs) enjoy the same standards of equality, rights and dignity as everyone else. It aims to make progress towards the following humanitarian commitments:

- Global Disability Summit (GDS) Commitment 1: Implementing the Humanitarian Inclusion Standards for older people and people with disabilities and Islamic Relief's commitments for the Inclusion Charter and the Charter for People with Disabilities in Islamic Relief Worldwide programmes.
- Humanitarian Inclusion Standards (HIS) 5: Older people and people with disabilities have access to safe responsive feedback and complaints mechanisms.

Islamic Relief Palestine Complaints Commitment Statement

Islamic Relief Palestine is accountable to beneficiaries, partners, our staff and anyone affected by the work we undertake. Islamic Relief Palestine guarantees the right of individuals and organisations to complain if they perceive they are being subjected to abuse and exploitation within Islamic Relief Palestine activities, or by our staff or representatives of the organisation. Islamic Relief Palestine has zero tolerance for corruption and bribery and is committed to listen to and address any violation of the rights of workers, service providers, suppliers, contractors, beneficiaries and/or local communities. Islamic Relief Palestine deals with all concerns and complaints quickly, confidentially and fairly. The necessary procedures are taken in accordance with the approved complaints system. Any complaint will in no way affect the services provided by Islamic Relief Palestine.

Recognising the additional vulnerabilities and potential barriers to inclusion facing PWDs, Islamic Relief is committed to ensuring that all of its programmes and services are inclusive to all, by improving accessibility for PWDs and by designing programmes and services that respond to and incorporate PWDs' perspectives and preferences regarding inclusion and their rights. Islamic Relief aims to provide PWDs and Disabled Persons' Organisations (DPOs) the opportunity to exercise their right to voice their opinions and take an active role in developing effective and inclusive communication channels and the ability to access and exchange information from a variety of trusted sources. Islamic Relief seeks to provide an accessible and safe environment that responds to and addresses the needs of all target groups; enables those groups to have their voices heard; increases the organisation's understanding of those groups' perspective and needs; welcomes and accepts their views; and addresses any complaints to improve the organisation's capability to deliver effective, reliable and inclusive services.

Development and humanitarian actors have together committed to improving disability inclusion. At the 2018 Global Disability Summit, Islamic Relief Worldwide, along with dozens of other state and non-state actors, made a series of commitments to tackle critical issues such as exclusion from education, livelihoods, stigma and discrimination and engaging with organisations of PWDs. These commitments build on existing legal obligations for state actors, such as the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), as well as policy frameworks such as 'Leave no one behind', the underlying political commitment of the 2030 Agenda for Sustainable Development and the Charter on inclusion of persons with disabilities in humanitarian action, of which Islamic Relief is an endorser.

Disability in Palestine

According to the Population, Housing and Establishments Census (2017), PWDs in Palestine constitute 2.1 per cent (92,710) of the total population: 48 per cent of PWDs live in the West Bank and 52 per cent in the Gaza Strip. Over half (51 per cent) of PWDs have some form of mobility disability.

Children aged under 18 years constitute 20 per cent of PWDs in Palestine. This figure is higher in the Gaza Strip (22 per cent) than in the West Bank (17 per cent). The percentage of male children (21 per cent) with a disability is slightly higher than for females (18 per cent). According to the 2017 Census, the number of PWDs in Palestine in urban areas is 69,242, representing 75 per cent of the total number of PWDs. Some 28,563 of PWDs in urban areas reside in the West Bank, constituting 64 per cent of the total number of PWDs in the West Bank. There are 40,679 PWDs in urban areas in the Gaza Strip, which represents 85 per cent of the total number of PWDs in this area. Thirteen per cent of PWDs live in rural areas, while the remaining twelve per cent of PWDs live in Palestinian refugee camps.

Illiteracy rates among PWDs aged ten years and over reached 32 per cent in Palestine in 2017. There is a significant gender gap regarding illiteracy rates. 20 per cent of males with disabilities aged ten years and over are illiterate, whereas the comparative figure for females is 46 per cent. The illiteracy rate for PWD aged ten years and over is 35 per cent in the West Bank and 29 per cent in the Gaza Strip. Almost half of Palestinian children with disabilities aged between six and 17 years were not enrolled in education in 2017 (51 per cent in the West Bank and 43 per cent in the Gaza Strip). Some 37 per cent of women with disabilities in Palestine who are currently married or who have been married experienced violence by their husbands at least once in the twelve months. The percentage varied considerably between the West Bank (30 per cent) and the Gaza Strip (42 per cent). 50 per cent of women who experienced violence were subjected to psychological violence, while 20 per cent were subjected to physical violence by their husbands at least once during the twelve month period. Some 27 per cent of PWDs aged between 18 and 64 years in Palestine who had never been married experienced violence from a household member at least once in the twelve months preceding the interview in 2019. There was considerable variation between the West Bank (19 per cent) and the Gaza Strip (35 per cent). Approximately one-third of this group were subjected to psychological violence, while almost one-fifth experienced physical violence.

The 2017 Census data indicates that the unemployment rate among PWDs in Palestine who are aged 15 years and over and are participating in the labour force is 37 per cent (19 per cent in the West Bank and 54 per cent in the Gaza Strip).

Disability inclusion in Islamic Relief

Islamic Relief believes that safeguarding is everyone's responsibility. We are committed to work to ensure a safe and supportive environment for all. Islamic Relief recognises safeguarding as part of our culture, values, activities and programmes. We strive to create an environment that is free from any form of discrimination based on sex, age, (dis)ability, race, ethnicity, religious or other beliefs. Islamic Relief affirms our commitment to preserving the dignity and protection of those we serve, including children, young people, women, men, older persons and PWDs, along with our staff, volunteers and trainees, from abuse, discrimination and exploitation in all its forms. This includes, in particular, protection from sexual exploitation. Islamic Relief is committed to ensuring that all are protected against the risk of harm or abuse through effective policies, actions and other practical measures.

Islamic Relief demands that all partners, service providers and those involved in activities and programmes, or their representatives, are committed to ensuring that protection remains a priority in the delivery of services.



During a FGD with DPOs and PWDs

Inclusion of PWDs represents an ever more important global commitment for development and humanitarian actors, including Islamic Relief. Islamic Relief Palestine is committed to promoting inclusion through its programmes to support and empower members of Palestinian society of all (dis)abilities and ages to claim their rights and to participate in decision-making to help shape their future and bring about positive change in their society.

In recent years, Islamic Relief has sought to improve its performance in relation to disability inclusion through an integrated approach to mainstreaming protection and inclusion across its programmes.

To ensure that accountability is extended to all people, inclusive accountability mechanisms must be designed that consider the requirements of and be accessible to all target groups, including PWDs. This includes a duty to focus on disability inclusion throughout the humanitarian programme cycle, ensuring that PWDs are able to participate in decision-making processes and communicating information to them in multiple accessible formats.

Islamic Relief's Intersectionality Framework

Islamic Relief has developed an intersectionality framework that places Protection and Inclusion (P&I) at the core of all of our programming. This approach is based on the 6 As: Analysis, Adapted Assistance, Attention to Negative Effects, Adequate Participation, Accountability and Adequate Capacity. It is designed to ensure that P&I is integrated throughout our humanitarian programming.

A comprehensive Analysis of the needs of all men, women, boys and girls of different ages and people with disabilities, along with systematic collection of sex, age and disability disaggregated data ensures P&I is integrated into programme design.

Adapted Assistance for flexible, inclusive programme implementation and Attention to negative effects covers the 'do no harm' approach, including being sensitive to and aware of the cultural and social context in which the programme is operating.

Adequate participation looks at the meaningful participation of all social groups throughout the programme lifecycle, with rigorous measures in place to ensure Accountability to all at risk groups.

Finally, Adequate capacity ensures the relevant Islamic Relief country office teams and national partners possess appropriate resources and have the right policies in place to efficiently and effectively mainstream P&I considerations throughout the programme.

Purpose of this study



During a FGD with sponsored children discussing complaints handling channels to reach out to the furthest left behind

The goals of this study are to:

- Identify any barriers and challenges faced in accessing complaint handling and feedback mechanisms by PWDs.
- Explore various and appropriate channels to complaint handling mechanisms that are accessible for PWDs.
- Provide recommendations to Islamic Relief Palestine to improve and enhance the effectiveness of inclusive feedback and complaint handling mechanisms within the organisation.

Methodology

The study collected and analysed a combination of quantitative and qualitative data. A questionnaire containing both open-ended and closed questions, structured interviews and two focus group discussions (FGDs) were conducted with a wide range of stakeholders, including project beneficiaries, persons with different types of disabilities and DPOs.

The study featured 212 participants, including beneficiaries of a Sida project, children supported by the Islamic Relief Orphans Sponsorship programme (OSP) and DPOs.

The participants included 19 males and 20 females aged 17 years old; 80 males and 91 females aged between 18 and 49 years old; and two males aged between 50 and 59 years old.

Participant interviews and FGDs provided a window into the complex socioeconomic and cultural factors within the family and community that contributed to the exclusion of PWDs from adequate participation. A questionnaire was developed and undertaken through phone interviews with beneficiaries of the Sida-funded cash-for-work project in June and July 2020. Some 9.1 per cent of respondents were with various difficulties. Interviews were undertaken via telephone due to restrictions imposed on fieldwork as a result of Covid-19.

A literature review was also undertaken through the online library search to examine relevant initiatives and studies to develop a broader and more in-depth understanding of the context and issues.

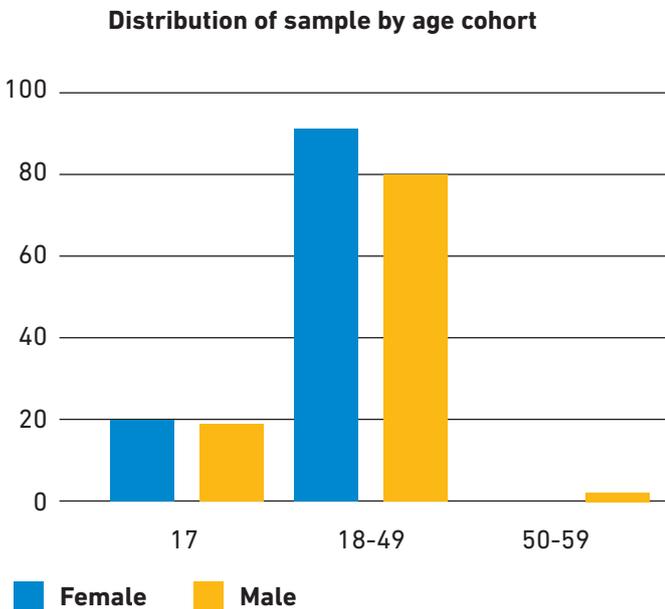


Chart 1: Distribution of sample by age cohort

During the FGD with DPOs, the following topics were discussed:

- The appropriate tools for all segments of society of all (dis)abilities and ages to file feedback and complaints in an appropriate, confidential and safe manner.
- The barriers that prevent PWDs (all types of disability) from providing feedback and filing complaints.
- Potential solutions and recommendations to remove these barriers.

During the FGD with sponsored orphans, the following topics were highlighted:

Islamic Relief Palestine’s complaint mechanisms and how to file a complaint. The purpose of putting strong policies in place and ensuring that they are widely shared and understood.

- The organisation’s commitment to the policies of safeguarding, child protection and complaint handling. How Islamic Relief Palestine provides information and seeks to empower local communities regarding our safeguarding framework through orientation sessions, awareness sessions and regular meetings during field visits with beneficiaries.
- The distribution of project brochures that contain Islamic Relief Palestine’s commitments on safeguarding, complaint and child protection, as well as a separate brochure on how to file a complaint.
- The means adopted to receive complaints, e.g. email, mobile, fixed complaint box and moving complaint box during the distribution of information and other externally focused activities.

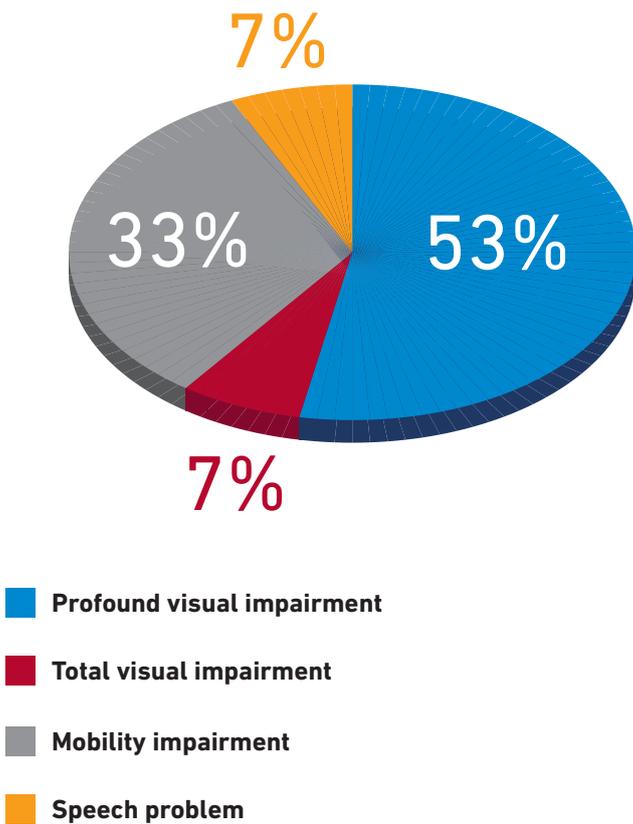
Participants’ views of Islamic Relief Palestine’s complaint mechanisms and their recommendations for improving inclusive complaint mechanisms:

- Respecting the cultural norms, men and boys and women and girls were split into separate groups. Participants were asked to provide their recommendations on the means to make complaint mechanisms accessible for all people with different (dis)abilities if they are not satisfied with the service that is currently provided or if they perceive any breach of their rights.
- Participants stressed the importance of raising awareness among beneficiaries regarding the confidentiality of the complaint letter submitted to the organisation.
- Participants suggested that the available mechanisms to file a complaint should include:
 - Email
 - WhatsApp
 - Social media (especially Facebook as it is the most commonly used platform by participants)
 - Fixed complaint box at each local partner office in each governorate
 - An additional complaint box in Islamic Relief vehicles.
- Participants suggested that activities to follow up complaints and monitor compliance should include:
 - Random calls to beneficiaries who had submitted a complaint by an employee specifically responsible for complaints
 - Questionnaires
 - Interviews.

A questionnaire was developed and undertaken through phone interviews with beneficiaries of the from Sida funded cash-for-work project in June and July 2020.¹

Some 9.1 per cent of respondents were with various difficulties. Interviews were undertaken via telephone due to restrictions imposed on fieldwork as a result of Covid-19.

Distribution of various difficulties among interviewees



- Profound visual impairment
- Total visual impairment
- Mobility impairment
- Speech problem

Chart 2: Distribution of various difficulties among interviewees

The questionnaire undertaken with beneficiaries of the cash-for-work project was developed to measure the satisfaction of beneficiaries regarding the intervention. It included several questions related to beneficiaries' experiences and complaints handling, such as:

- relevance of the intervention to their needs, priorities and specialty
- satisfaction with the experience gained, benefit received from awareness workshops on GBV, mechanisms and methods of implementation and whether these preserve respect for rights and dignity, facilities available, accessibility to workplace, staff attitude & behaviour
- impact of the project and engagement with Islamic Relief Palestine on the lives of beneficiaries and whether this was positive or negative
- satisfaction with feedback mechanisms, methods of communication, responses to enquiries, beneficiaries' level of knowledge and awareness of the complaint mechanisms, types of challenges faced by beneficiaries and recommendations on how to improve the complaint mechanisms.

A literature review was also undertaken through the online library search to examine relevant initiatives and studies to related to develop a broader and more in-depth deeper understanding of the context and issues.

¹ The project, 'Improved Food Security and Restoring Livelihoods for Conflict Affected People in Gaza through Temporary Cash-for-Work Assistance', PIN Code: 020_003045-04 funded by Islamic Relief Sweden with funding sourced from Sida. The project targeted 535 male and female graduates and unskilled labourers from vulnerable and food insecure households. They received paid temporary employment opportunities in local community based organisations or private businesses and the agricultural sector for over a 4 month period.

Findings

Challenges and suggestions according to participants' (PWDs) perspectives:

There are a number of existing channels available for filing complaints:

1. Complaint drop box

Current mechanism:

The complaint drop box is placed in our office reception, where both males and females can access it. A complaint registration form was developed to make it easy for complainants to list all the required information regarding their complaint. Copies of the complaint registration form are printed and placed beside the complaint drop box to be used to register complaints. The receptionist received basic training in sign language to be able to communicate with visitors who are deaf or hard of hearing. In addition, a brochure explaining the complaint mechanism is also placed at the reception. The complaint drop box is opened every week by the complaint focal point, who numbers, sorts and assesses any complaints.

Best practice:

The receptionist received basic training to use sign language and communicate with visitors with deaf and hard of hearing

There are also mobile complaint drop boxes that accompany staff who undertake field activities, along with the complaint registration form. These mobile complaint drop boxes are locked with plastic security seals. Complaint drop boxes have also been placed at local partner organisations, enabling people to access them more easily within the same governorate.

Key challenges:

Persons with (dis)abilities identified the following challenges in accessing the complaint drop box:

- The main entrance of the workplace is not accessible for wheelchair users as there is no ramp.
- The height of the reception table is too high, preventing wheelchair users from communicating with the receptionist.
- The location of the complaints box is not at an accessible height for wheelchair users inside the organisation.
- The complaint registration form and brochure regarding complaints handling mechanisms are not available in Braille. In addition, there is no Braille language written

on the complaint drop box beside the Arabic and English language.

- In regards to moveable drop boxes, these may not always be available for staff undertaking field work to take with them. There is no written procedure for managing moveable drop boxes and staff may delay relaying complaints to the complaint focal point. Complaints received through the moveable drop box are not registered at the accredited complaint focal point which means complaints often lack critical information, hindering efforts to address the complaints.
- There is no standardised and written procedure to manage the complaint drop boxes at local partner organisations.

Solutions and recommendations:

- The entrance to our office should be barrier-free and adapted to meet the needs of all people, so that all people, with and without disabilities, can use the same entrance. The complaints box should be placed in a location that is free from obstruction and at a suitable height for wheelchair users.
- The workplace should be fully prepared to meet the needs of PWDs.
- Printed pamphlets and/or posters regarding the complaints handling mechanisms should be placed in our reception. They should be in a variety of formats, including Braille, to guide people with visual impairments and in an enlarged font for people who are partially sighted.
- The locks on mobile drop boxes should be metal, as opposed to plastic, to provide greater security.
- A comprehensive procedure should be developed to manage the process for dealing with the moveable complaint drop box.
- The complaint registration form should be available with the moveable complaint drop box.
- A procedure should be developed to manage complaint drop boxes at local partner organisations and replicated across all local partners.

2. A hotline mobile number

Current mechanism:

A hotline for complaints is operated by the complaint focal point, who is the Quality Assurance Manager. This channel allows people to call or send text messages during its hours of operation. All beneficiaries are informed about the hours of operation, when it is possible to contact the complaints focal point, during the sensitisation workshop. This information is also printed and disseminated to all beneficiaries and copies are placed in the reception.

Key challenges:

- No full time role exists that is dedicated to managing complaints. There is only a focal point for complaints management who is simultaneously the safeguarding focal point.
- The hotline is only staffed to receive calls during limited hours (9am until 3pm) and only during working days (Sunday until Thursday). If the complaint focal point is unavailable during that time then the complainant's call is returned later.
- The purpose of the hotline appears unclear or misunderstood as most of the calls received relate to clarifications regarding services.
- The mobile phone used for the complaints hotline is not a smart phone, which limits the ability to receive complaints via video, text messages or through applications such as WhatsApp. This also limits the use of other applications that are used for accessibility purposes by PWDs. Potential complainants' ability to access the hotline may be limited if they cannot afford to pay for the call.

Solutions and recommendations:

- A specific budget should be allocated to increase accessibility to the complaint mechanism and for complaint handling, to cover the cost of additional accessibility measures and communications.
- A smart phone should be provided for the complaint hotline to increase accessibility and enable the installation of applications used by PWDs.
- The possibility of establishing a freephone number for the hotline should be explored. Email and website

3. Email and website

Current mechanism:

There used to be a specific email address at Islamic Relief Palestine's office to register complaints. However, this email address was removed and a unified complaints email for all offices created and managed by Islamic Relief Worldwide.

Key challenges:

- The variety of channels to receive complaints places additional demands on the time of the complaint focal person.
- The website is not accessible for PWDs, meaning that the complaint focal person is not able to communicate with and engage with the complaints of all PWDs.

Solutions and recommendations:

- A budget should be allocated to upgrade the Islamic Relief Palestine website to ensure it is accessible for all PWDs.

4. Interview with the complaint focal point

Current mechanism:

Any complaints can request an interview with the complaint focal point.

Key challenges:

- The complaint focal point may not be available to meet with the complainant at the time requested, which requires scheduling meetings in advance.
- The complaint focal person is not equipped with the needed skills to communicate with all PWDs.

Solutions and recommendations:

- Provide training to a deputy complaint focal point who can handle and respond to complaints in the absence of the main complaint focal point.
- As standard practice, schedule a meeting for interviewing any person who is filing a complaint.
- Engage with DPOs to facilitate this process.

5. During feedback and satisfaction surveys, interviews and FGDs with participants

Current mechanism:

The Quality Assurance Unit (QAU) leads on the complaint handling mechanism. Anyone who wishes to file a complaint, but did not use any of the previously highlighted channels, can outline their complaint during the feedback/satisfaction questionnaires, interviews or FGDs.

Key challenges:

- Complaints raised via the satisfaction questionnaire may relate to a broad range of issues, e.g. dissatisfaction about the service provided or regarding the conduct of contractors, which may lack context due to the lack of engagement with the complainant.
- Potential solutions to such issues might require additional budget expenditure, which poses challenges in addressing the complaint if there is no allocated budget to cover the expenses for implementing those solutions.
- The complaint focal person might not see or consider the complaints raised via the satisfaction survey, unless the complainant is referred to the complaint focal point directly.

Solutions and recommendations:

- Monitoring, Evaluation, Accountability, and Learning (MEAL) staff should be prepared to refer complaints raised during the feedback or satisfaction questionnaire process, regardless of the method used to submit the complaint.

General barriers to accessing inclusive feedback and complaint handling mechanisms

In general, PWDs face barriers that restrict them from participating in society on an equal basis with others every day. The participants shared the following barriers that prevent persons with a range of disabilities in accessing feedback and complaints handling mechanisms.

An accommodation is a modification or adjustment to instructional methods and/or programme, service, activity, or facility that enables PWDs to have an equal opportunity. An equal opportunity means an opportunity to enjoy equal benefits and privileges as are available to a similarly-situated person without a disability. Necessary accommodations to ensure equal opportunity are determined by examining the actions that might remove the barriers.

1. Communication barriers

Based on the literature review and interview results, communication barriers are experienced by PWDs that affect hearing, speaking, reading, writing and/or understanding, who use different ways to communicate than people who do not have these disabilities. Participants highlighted examples of communication barriers, including:

- The services provided are not adapted to the different needs of PWDs, e.g. information is not disseminated in a language understood by all target groups from different (dis)abilities. For example, persons with hearing disabilities may have additional vulnerabilities and lack basic literacy skills except sign language, while Braille coding is required for the visually impaired.
- A lack of knowledge or clarity of the available mechanisms for addressing the complaint by the target groups, especially if target groups are not oriented about their entitlements or the services they will receive from the project.
- Target groups do not know their entitlements from the projects, as they were not effectively sensitised about this information through means such as workshops or programme brochures. Lack of effective participation is an obstacle to the claim of rights in the assistance.
- Staff members are not able to communicate in sign language or use Braille, preventing them from listening and understanding complaints raised by people with hearing or visual impairments.

Solutions to address communication barriers:

- Develop the provision of information services to meet international best practice standards suitable for all types of PWDs. Undertake awareness raising campaigns regarding protection and safeguarding policies to encourage target groups to fully understand and demand their rights, through:
 - Use of modern technology to communicate knowledge and raise awareness on rights in an appropriate manner for each group and their differentiated needs.
 - Awareness raising workshops regarding the feedback and complaints handling mechanisms for all groups, including families of PWDs and managers of local organisations and decision makers, taking into account the varied needs of persons with different disabilities.
 - Placement of printed pamphlets and/or posters regarding complaints handling mechanisms at the reception in the organisation in a variety of formats, including in Braille and enlarged font for those with varying degrees of visual impairment. Development of printed leaflets with images, including literary emojis and symbols, for people who experience difficulties with hearing and speaking.
 - Greater use of sign language, including through video advertisements and explanations.
 - Dissemination of information with adequate explanation of the complaints handling mechanisms on different social media sites that are accessible to all persons, including those with disabilities.

2. Attitudinal barriers

Attitudinal barriers are the most common form of barriers to participation and contribute to reinforcing other barriers. Some people may not be aware, for example, that difficulties in getting in and out of a place can limit the participation of a person with a disability in everyday life and common daily activities. Participants highlighted the following attitudinal barriers:

- Lack of self-esteem, self-worth and confidence among PWDs, which prevents them from filing a complaint.
- Limited interaction of PWDs with organisations.
- Uncivil attitude and inattention to the complaint and case of PWDs.
- Lack of confidence in organisations and the feeling that there will be no improvement, or they may be harmed if they file a complaint.
- PWDs may not accept their impairment, while family members, including parents, consider the impairment a stigma and disgrace. There is also a lack of acceptance of PWDs from society. They are bullied and ridiculed by some members of the community, including being subject to physical assault, such as having stones thrown at them by young children. Exploitation by parents of their child's disability (in all respects: material, moral, discrimination, depriving females with disabilities of their rights such as inheritance) and the lack of mutual trust between the two parties, as well as discrimination by their parents. Non-recognition of the right of PWDs to work.
- PWDs can perceive themselves to possess weak capabilities and are afraid of doing anything and engaging with others as a consequence. Spread of the culture of no use in filing complaints and the fear of harm as a result of filing a complaint.

Solutions to address attitudinal barriers:

- Educate and inform PWDs, their parents and decision makers regarding the rights of PWDs, through awareness raising workshops, the provision of information via brochures and through the media. Establish specific mechanisms to ensure confidentiality, with all target groups being made aware of the strict confidentiality of all shared data when dealing with complaints.
- Implement additional capacity development programmes for PWDs to strengthen the knowledge and build the capacity of PWDs.

Highlight successful and inspirational models of PWDs to break down barriers among their peers and demonstrate means in which stigma and discrimination can be addressed and overcome.

- Provide psychological support to beneficiaries with disabilities to enhance their self-confidence, overcome their fear and increase their confidence in the complaints process and the belief that a positive change will take place as a result of filing a complaint.

Atfaluna Society for Deaf Children provided sign language training to bank tellers at the Bank of Palestine to facilitate dealing with persons with hearing disabilities and enhance their self-reliance in completing their own transactions, such as receiving a salary, without the need for a sign interpreter to accompany them to the bank.

3. Environmental barriers

Physical barriers are structural obstacles in natural or man-made environments that prevent or block mobility or access. Participants highlighted the following physical barriers:

- Buildings are not accessible for all types of disabilities, including lack of ramps and elevators within our offices. The complaints box is not located at an appropriate and accessible height for wheelchair users inside the office.

Solutions to address environmental barriers:

- Increase the accessibility of offices for people of different abilities and ages, such as:
 - Ensure the entrance to the office is barrier-free and adapted to meet the needs of all people equally, including an accessible entrance that can be used by both people with and without a disability. One of the attendees mentioned that he has the right to enter the organisation's building like everyone else without being stigmatised.
 - Provide audio instructions for people with visual impairments and ensure the entrance is accessible for them by installing floor tiles that are identifiable by different textures and are detectable by people with visual impairments.
 - Place the complaints box in a clear location and at a suitable height for wheelchair users.
 - Install handrails at the entrance.

4. Policy and programmatic barriers

Policy barriers are related to a lack of awareness or enforcement of existing policies, procedures and regulations that require programmes and activities to be accessible to PWDs. Programmatic barriers limit the effective delivery of a programme for people with different types of impairments. Participants highlighted the following policy and programmatic barriers:

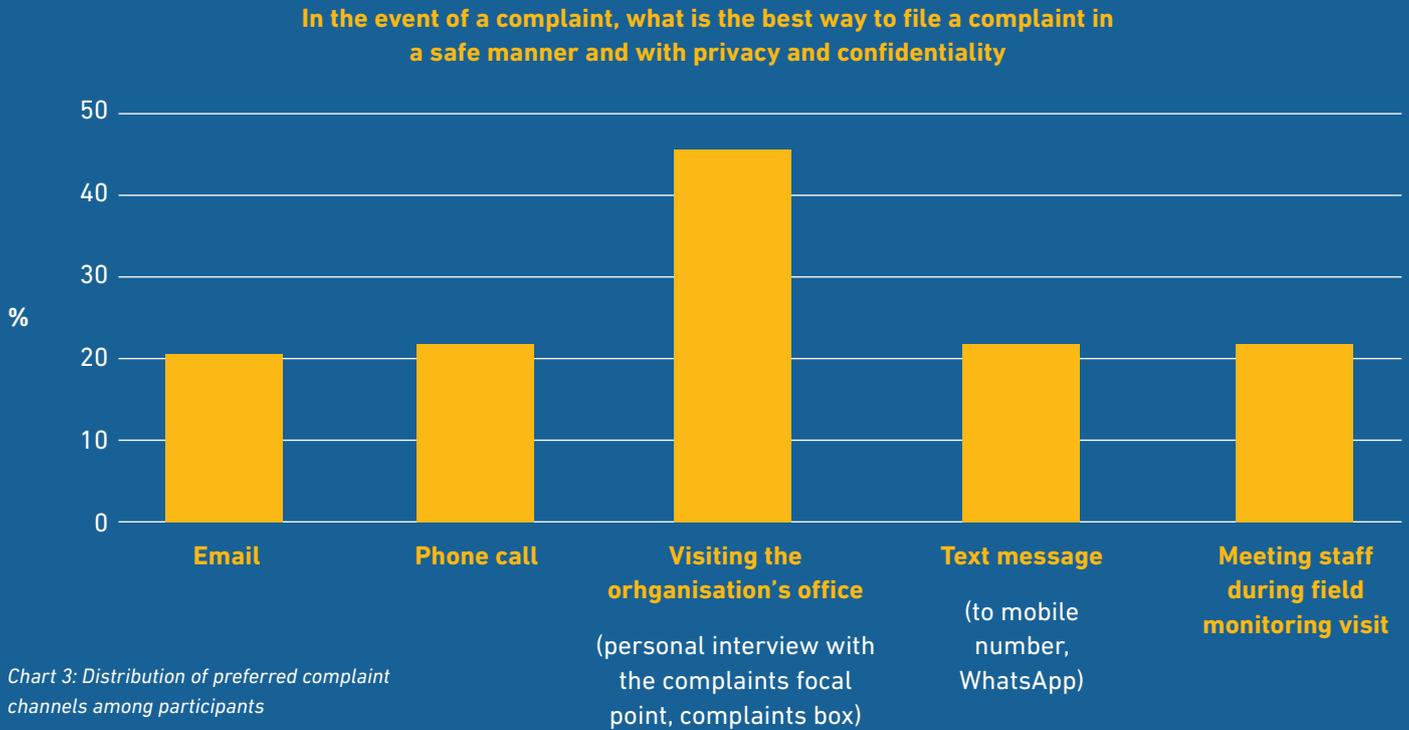
- A lack of knowledge of policies related to filing and handling complaints.
- A lack of knowledge and application of international conventions and local laws for PWDs.
- Policies, regulations and procedures do not provide protection for complainants.
- Transparency issues, such as the organisation's failure to respond to a complaint, a lack of confidence that the organisation will be held accountable, lack of confidence in the organisation's system and policies and the lack of a follow-up or monitoring system to assess whether the complaint has been adequately responded to and improvements made.
- A lack of deterrent measures for those who breach the policies and code of conduct.
- Complaints handling processes do not adequately consider gender issues or sensitivities in relation to the type of complaint filed.

Solutions to address policy and programmatic barriers:

- Disseminate and communicate the international convention and local laws for PWDs, including that if the laws relating to PWDs are activated and applied, then PWDs and DPOs can file complaints against organisations that do not comply with these laws (for example: five per cent of an organisation's workforce must consist of PWDs).
- Establish an integrated and comprehensive system for handling complaints; apply the system effectively and hold the organisation accountable if it is not applied.
- Select a reputable and reliable focal person to follow up on the complaints file. Deliver reassuring and inclusive messages to target groups that if complaints are filed, the assistance provided to them will not be compromised and the complaint will be managed by the highest level of management in the organisation.
- Using the same mechanism in which the complaint was received (e.g. automatic reply if it is an email, text message if the complaint is received as a text to mobile), inform the complainant that the complaint has been received and that it will be followed up in a timely manner.
- Ensure that all staff are responsible for communicating any complaint they receive and hold them accountable if they do not communicate complaints to the complaint focal point.
- Resolve the complaint within the permissible period of time, which is a maximum of 20 days; undertake regular communication with the complainant to keep them updated until the conclusion of the complaint, reinforcing that the complaint will not compromise the service provided. Require decision makers to implement policies and regulations to protect the rights of PWDs.
- Establish a gender-sensitive complaint handling mechanism, due to the sensitive nature of some complaints and allegations, which may affect the willingness of female complainants to file a complaint if the focal point is a male. A gender-sensitive protocol should be implemented, including having a trained female complaint focal point wherever possible.

Preferred channels to file complaints

The respondents to the questionnaire stated their preferred channels to file complaints and provide feedback.



The above chart illustrates the various and preferred channels to file complaints and provide feedback. This information helps to strengthen understanding of how PWDs are included in aspects of programmes, such as complaints mechanisms. It also assists in identifying their preferences at the programme design stage, giving them a voice and helping to build trust.

According to feedback from the complaint focal point, the most used channel to file complaints is via phone call. This is particularly the case following the protective measures imposed in response to COVID-19, as all beneficiaries have a mobile in each household.

Sponsored children and their families stressed the importance of sensitising all beneficiaries about the confidentiality of the information they provide to the organisation. They have suggested the following channels:

- Email
- WhatsApp
- Social media (especially Facebook as it is the most commonly used platform by participants)
- Fixed complaint box at each local partner in each governorate
- An additional complaint box in Islamic Relief vehicles.
- Participants suggested activities to follow up complaints and monitor compliance should include:
 - Random calls to beneficiaries who had submitted a complaint by an employee specifically responsible for complaints
 - Questionnaires
 - Interviews.

Appropriate and safe channels to facilitate access to file a complaint

An accommodation is a modification or adjustment to instructional methods and/or programme, service, activity, or facility that enables PWDs to have an equal opportunity. An equal opportunity means an opportunity to enjoy equal benefits and privileges as are available to a similarly-situated person without a disability. Necessary accommodations to ensure equal opportunity are determined by examining the actions that might remove the barriers.

There are general channels that meets the needs of persons with all types of disabilities, including a face-to-face interview with the complaint focal point in a safe and accessible place in the office. Collaboration with DPOs will ensure appropriate access is provided and specific cases should be referred through the accredited referral pathway.

The following channels were identified as appropriate and safe for persons with different disabilities.

1. Persons with physical disabilities

- Through a facilitator in the organisation who is dedicated to registering complaints in instances where the complainant may be unable to read and/or write. Text messages on a mobile number designated for complaints or accounts on social networking sites that can receive complaints.
- Email.
- Phone call.
- Accessible complaint drop box.

2. Blind persons and those with visual impairment

- Through a facilitator in the organisation who is dedicated to registering complaints in instances where the complainant may be unable to read and/or write.
- Via assistive technologies services, such as a reader or writing device.
- Written complaints in Braille language, which can be read by a professional Braille reader.
- Via reading text/speech production applications, such as Job Access with Speech (JAWS) for people with visual disabilities.
- Voice messages at the mobile number designated for complaints and through social media applications, such as WhatsApp.Voice/speaking calls, through the use of applications and speaking programs to meet the needs of people with visual impairment, which convert electronic versions on computers into spoken versions.
- Email.
- Complaint drop box.

3. Persons with deafness or who are hard of hearing

- Through a facilitator in the organisation dedicated to registering complaints from those that are deaf or hard of hearing. Text messages and video calls on a mobile number designated for complaints.
- Email.
- Written complaint.

4. Persons with intellectual disabilities

- Face-to-face interview with the complaint focal point in a presence of a psychologist. Meeting with the parents/guardian to hear the complaint through them, and so understand the details of the complaint.

Conclusion

Based on the feedback of Sida participants and other participants in this study, PWDs continue to face significant attitudinal, physical, legal, economic, social and communication barriers to participate in public life. This study identifies a number of accessibility barriers for PWDs that impact their ability to provide feedback and file complaints. Efforts should be made to remove these barriers by creating a supportive and inclusive environment for all people with different (dis)abilities and ages and developing and communicating the appropriate channels for different target groups to most effectively file complaints.

The study reveals that some of the barriers faced by PWDs are also faced by female and male participants without disabilities. A lack of awareness raising and empowerment activities that provide information to beneficiaries to ensure they can actively participate and fully understand their rights, entitlements and safeguarding undermines their confidence and ability to claim their rights and share their concerns.

Such findings should be incorporated into future programming in the form of operational procedures, resources and tools to make sure that PWDs are able to equitably access all communication channels and services.

A Specific, Measurable, Achievable, Realistic, and Timely (SMART) participant communication and complaint response and feedback mechanism plan should be developed that incorporates these findings and which is based on enabling the active participation of right-holders. This should be considered as a key requirement in the programme planning phase and should be monitored and evaluated during programme implementation. The complaint response and feedback mechanism plan should incorporate awareness, sensitisation and feedback activities to ensure adequate and equitable access to information for participants of all ages and abilities so that they are fully empowered to know and claim their rights.

Addressing and facilitating the inclusion of marginalised groups must begin at the programme design stage. Adequate resourcing, including staff capacity and time, must be provided. There is a need to continuously strengthen tools and ensure suitable guidance is provided to staff and partners and encourage its use at the programme level.

Progress can be made by Islamic Relief Palestine through these series of changes to ensure that PWDs are able to exercise their particular rights on an equal footing with others.

Recommendations

This study makes the following recommendations:

Mobilise adequate, timely and predictable resources to operationalise Islamic Relief Palestine's commitment to preparedness and response that is inclusive of and accessible to PWDs, following a human rights-based approach in our programming efforts to avoid excluding members of this group.

1. Allocate an annual budget for compliance with these commitments at the organisational level. This can be done though allocating a specific budget item for each project.
2. Mainstream accessibility as a comprehensive issue throughout the work and activities of Islamic Relief Palestine.
3. Build active relationships with DPOs to better understand barriers to meaningful participation, strengthen referral to external pathways, confirm compliance with protection standards, disseminate the principles of inclusion in all Islamic Relief programmes and identify any other necessary programme or organisational amendments.
4. Establish a gender-sensitive complaint handling mechanism, due to the sensitive nature of some complaints and allegations.
5. Advocate, along with DPOs, for the implementation of international conventions and local laws for PWDs.
6. Undertake efforts to remove these barriers by creating a supportive and inclusive environment for all people with different (dis)abilities and ages and develop and communicate the appropriate channels for different target groups to most effectively file complaints. The following changes are suggested:
 - Print and disseminate written materials related to the complaints handling mechanisms, with additional information that reaffirms the commitment to equal access for PWDs to provide feedback and file complaints.
 - Information should be accessible in alternative forms to enable access for PWDs, e.g. Braille texts, large line, easy-to-read materials and audio material. A sign interpreter must be provided when receiving a complaint from people with a hearing impairment. In the longer term, a number of employees must be trained in the use of sign language. The organisation's receptionist should receive advanced sign language training. Appropriate applications and speaking software should be available to meet the needs of people with visual impairments and a Braille language translator provided.
 - A smart phone with applications such as WhatsApp should be provided to the complaints focal point, so complaints can be received from people of different abilities and ages.
 - Complaint boxes with a lock should be implemented. These should feature a summary of the complaint box opening procedure, alongside the complaint registration form, in Arabic, English, sign language code and Braille. A complaint box should be located at each partner office to further facilitate access for all people of different ages and (dis)abilities.
 - The possibility of establishing a freephone number for the complaint hotline should be explored.

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