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Strengthening the Citizen-State Compact through Feedback: Effective Complaint Management as a Pathway to Articulate Citizen Voice and Improve State Response

Summary Assessment Report on Complaint Handling Mechanisms in Palestine

July 21, 2016

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MIDDLE EAST AND NORTH AFRICA



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Complaint Handling Mechanisms in Palestine



June 15, 2016

WORLD BANK GROUP

SUMMARY ASSESSMENT REPORT
Strengthening Complaint Handling Mechanisms in Palestine

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[1] Ministry of Social Affairs (MoSA) recently transformed itself to become "Ministry of Social Development (MoSD)". As all activities under this technical assistance took place prior to this institutional change, this report will use "Ministry of Social Affairs (MoSA)".

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Acronyms

CHM	Complaint Handling Mechanism
CMS	Complaints Management System
CSO	Civil Society Organization
CU	Complaints Unit
DGC	Directorate General of Complaints
GS	Gaza Strip
ICHR	Independent Commission for Human Rights
IEC	Information, Education and Communication
LGU	Local Government Unit
MIS	Management Information System
MoE	Ministry of Education and Higher Education
MoH	Ministry of Health
MoLG	Ministry of Local Government
MoSA	Ministry of Social Affairs (recently renamed as the Ministry of Social Development)
MP	Member of Parliament
NGO	Non-Governmental Organization
NLTA	Non-Lending Technical Assistance
PA	Palestinian Authority
PLA	Palestinian Land Authority
PMO	Prime Minister's Office
TA	Technical Assistance
WB	West Bank
WB&G	West Bank & Gaza

Executive Summary

Leadership is to have the humility to continue to get feedback and to try to get better.

- *Jim Yong Kim, World Bank President, April 2014*

The Palestinian Authority is committed to improving state-citizen relations through various mechanisms including the complaints resolution. "Regulation on Complaints No. 6", issued in 2009 by the Council of Ministers of the Palestinian Authority establishes an internal system for handling citizens' complaints which is based on rights-based approaches. The regulation provides for the establishment of a Directorate General of Complaints (DGC) in the Council of Ministers. It also outlines the role, mandate and procedures of Complaints Units (CUs) in Palestinian ministries. As a result, 56 CUs have been established in various ministries and Governorates. These units receive complaints about programs and services being implemented by their ministries.

The objective of this technical assistance, which has been undertaken at the request of the DGC, is to strengthen the Complaint Handling Mechanisms (CHMs) in five Palestinian ministries/government entities that are supported by World Bank-financed projects, as well as the DGC. The five ministries/government entities are the Ministry of Social Affairs (MoSA), the Ministry of Health (MoH), the Ministry of Education and Higher Education (MoE), the Ministry of Local Government (MoLG), and the Palestinian Land Authority (PLA).

The technical assistance resonates with the Bank's commitment to include beneficiary feedback in 100 percent of projects with clearly identified beneficiaries, as defined in the *Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations* (2013). CHMs are one way to empower citizens and integrate their voice into programs. The inclusion of an indicator on complaint handling—percentage of registered grievances resolved—in the World Bank Corporate Scorecard in 2014 is catalyzing the integration of CHMs in Bank projects and their results frameworks.

Activities undertaken as part of the technical assistance have included a preliminary assessment of CHMs in the five priority ministries and the **formulation of initial recommendations** for improving them, a **survey of complainants and others that have used/might use the CHMs in the five targeted ministries**, support to the elaboration of **Ministry-specific action plans**, several **workshops**, and a **study tour** for MoSA staff to learn from the CHM, established as part of Pantawid Pamilya, the flagship Conditional Cash Transfer Program of the Government of Philippines.

This summary report synthesizes key findings that have emerged throughout the technical assistance and formulates Ministry-specific recommendations. It forms the basis of a possible phase II of the project, which would support the implementation of recommendations. The report presents the innovative methodology used to bring together the demand- and supply-side perspectives on CHMs in targeted ministries; the key findings from the survey and the ministry-by-ministry assessments; the key suggestions for improvement; and finally the next steps.

Several interesting findings emerged from this assessment. Some of the key findings that are discussed in the report include the fact that information about the CU is being provided by a source other than a ministry in over half of the cases; that citizens often turn to third parties to voice their complaints and enquire about the complaint handling process; and that there is a good general awareness of the

procedures to file a complaint. In addition, survey results show that the key barriers to complaint submission are: perceived bureaucracy, need for technical and legal advice, frequent occurrence of personal mediation and low trust in government performance. These factors also impact citizens' readiness to appeal the results of the complaint handling process: although there is a fairly widespread willingness to do so, citizens express a certain degree of reluctance due to the system's reputation of being corrupt, slow and untrustworthy. Overall, behavior by CU staff towards complainants seems to be respectful, neutral and non-discriminatory, but there have also been some criticisms related to preferential treatment or gender discrimination. Communication about procedures and follow-up mechanisms, but also about results of the complaint by CU staff, has frequently not been perceived as clear or straightforward by citizens. In the GS, complainants have pointed out that they feel the physical facilities for complaint submission are not suited to that purpose, and missing or too complex grievance forms at the ministry. Finally, satisfaction rates with complaint resolution outcomes and timeliness of complaints handling have been found to be quite low. These are summarized in the table below.

CHM good practices	Key findings
Citizens know about the CHM.	• In the WB, an average of 4 to 6 people out of 10 know of the CU's existence. In the GS, between 6 and 7 people out of 10 are aware of it. • There is a good general awareness of the procedures to file a complaint: with the exception of the PLA in the WB, two thirds or more of respondents are aware of the procedures to file a complaint with a CU. • Information about the CU is being provided by a source other than a ministry in over half of the cases.
Citizens trust the CHM.	• Citizens often turn to third parties to voice their complaints and enquire about the complaint handling process. • Low trust in government performance is one of the factors keeping citizens from submitting their complaint to the CU.
Barriers to complaints submission are low.	• Key barriers to complaint submission are: perceived bureaucracy, need for technical and legal advice, and frequent occurrence of personal mediation. • In the GS, complainants have pointed out that they feel the physical facilities for complaint submission are not suited to that purpose, and missing or too complex grievance forms at the ministry.
The CHM informs users about procedures, follow-up mechanisms, and results.	• Communication about procedures and follow-up mechanisms, but also about results of the complaint by CU staff, has frequently not been perceived as clear or straightforward by citizens. • In the WB, between 34.8% and 62.5% of complainants find it easy to reach the CU to inquire about complaint handling procedures. In the GS, this percentage varies between 50.8% and 66%. • In the WB, between 13% and 62.5% of complainants agree that the CU has informed them clearly about the procedures and follow-up mechanisms linked to complaints. In the GS, between 63.8% and 72.5% agree. Complainants who are unclear about procedures and follow-up mechanisms tend to blame uncooperative CU employees. • A significant percentage of respondents is seeking help from outside the ministry to get updated information on the status of their complaints. • Complainants are not systematically informed about the result of their complaint.
The CHM is quick.	• Satisfaction rates with the timeliness of complaints handling remain fairly low overall, though they are systematically higher in the GS than in the WB.
The CHM is effective.	• Satisfaction rates with complaint resolution outcomes are quite low in the West Bank (the highest satisfaction rate is 37.5% for the PLA, the lowest 12.3% for the

	MoH), but relatively higher in the Gaza Strip (between 34.5% for the MoSA and 79.2% for the MoH). • Although there is a fairly widespread willingness amongst dissatisfied complainants to appeal the results of the complaint handling process (over half would do so), citizens also express a certain degree of reluctance due to the system's reputation of being corrupt, slow and untrustworthy.
The CHM treats all users equally.	• Overall, behavior by CU staff towards complainants seems to be respectful, neutral and non-discriminatory, but there have also been some criticisms related to preferential treatment or gender discrimination.

The technical assistance has helped identify several areas that need improvement in the existing complaints handling processes of the DGC, the four Ministries and the PLA. All entities requested additional staff, equipment, furniture and cars. The key suggestions for improvement to build trust and confidence of citizens in the ministry CHMs, include: clarifying roles and responsibilities of the CU vis-à-vis other departments within the ministry and the CU and the DGC; improving citizen awareness programs regarding complaint procedures; simplifying business processes and creating ministry-specific guidelines; fast-tracking the rollout of the Complaint Management System (CMS) that will allow online complaint submission; building capacity of staff involved in complaint resolution; and measuring complainant satisfaction through short surveys. Given the evident resource constraints, both financial and human, it will be key to prioritize these areas, mobilize internal and external resources from within the Ministry itself and development partners, and then implement relevant actions. The MoE example (see Box 2) clearly indicates that several actions can be taken internally by Complaints Units. Similarly, lessons from the CHM of the Ramallah Medical Complex (see Box 4) can be scaled up easily. Such commendable initiatives need to be further encouraged.

The technical assistance has generated high client interest among the concerned Ministries, the DGC and development partners. A follow-up through a second phase will help support the targeted ministries and the DGC in piloting recommendations from the assessments and expand the activities to other additional Ministries. Some possible activities to consider in Phase 2, subject to availability of funds, are: technical assessment of and support to strengthen/rollout the CMS; sensitization of senior management in all targeted Ministries towards CHMs; technical (and, to the extent possible, financial) support to the targeted Ministries to implement the suggestions for improvement and their action plans; capacity development of staff in Complaints Units to improve management of citizen complaints and use Complaints MIS; development of communications material (both internally for Ministry staff, and externally for CHM users) for all the Ministries; and finally, expansion of CHM strengthening activities to an additional 5 Ministries, subject to the availability of funds.

1. Introduction

1. **The objective of this technical assistance has been to strengthen the Complaint Handling Mechanisms (CHMs) in five Palestinian ministries/government entities** that are supported by World Bank-financed projects, as well as the Complaints Directorate in the Cabinet Secretariat. The five ministries/government entities are the Ministry of Social Affairs (MoSA), the Ministry of Health (MoH), the Ministry of Education and Higher Education (MoE), the Ministry of Local Government (MoLG), and the Palestinian Land Authority (PLA). The technical assistance has been undertaken at the request of the Complaints Directorate.

2. **The technical assistance resonates with the Bank's commitment to include beneficiary feedback in 100 percent of projects with clearly identified beneficiaries**, as defined in the *Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations* (2013). CHMs are one way to empower citizens and integrate their voice into programs. The inclusion of an indicator on complaint handling—percentage of registered grievances resolved—in the World Bank Corporate Scorecard in 2014 is catalyzing the integration of CHMs in Bank projects and their results frameworks.

3. **The technical assistance also aligns with the focus on strengthening the citizen-state compact specified in the WBG Assistance Strategy FY15-16 for the West Bank and Gaza.** Reflecting the PA's priorities as expressed in its National Development Plan, the strategy's first pillar is to "strengthen the institutions of a future state to ensure service delivery to citizens". The proposed outcome 1.2 is "increased transparency and accountability in service delivery". The strategy also builds on the governance elements present in the MNA's regional strategy through its emphasis on state- and institution-building. The technical assistance aligns well with these outcomes.

4. **Activities undertaken as part of the technical assistance have included a preliminary assessment of CHMs in the five priority ministries**[2] and the **formulation of initial recommendations** for improving them, a **survey of complainants and others that have used/might use the CHMs in the five targeted ministries**, support to the elaboration of **Ministry-specific action plans**, several **workshops**, and a **study tour** for MoSA staff to learn from the CHM, established as part of Pantawid Pamilya, the flagship Conditional Cash Transfer Program of the Government of Philippines.

5. **This summary report synthesizes key findings that have emerged throughout the technical assistance and formulates Ministry-specific recommendations. It forms the basis of a possible phase II of the project** which would support the implementation of recommendations. The report is structured as follows: Part 2 presents the context; Part 3 presents the methodology used to bring together the demand- and supply-side perspectives on CHMs in targeted ministries; Part 4 presents the key findings from the survey and the ministry-by-ministry assessments; Part 5 presents the key suggestions for improvement; and finally Part 6 presents the next steps.

[2] MoSA's CHM was not evaluated as part of the May 2015 mission since a rapid assessment had already been conducted during an implementation support mission in May 2014 for the World Bank-assisted Cash Transfer Project (CTP), leading MoSA to start implementing several of the recommendations from this earlier assessment.

2. Context

6. **The Palestinian Authority (PA) was established in the West Bank and Gaza shortly after the Oslo Accords of 1993**. The PA assumed civilian responsibility for most of the Palestinian residents: its security powers were limited, however, to the major urban centers. Israel maintained full control of large tracts of land around settlements and primary movement axes, leaving 61% of the West Bank (so-called Area C) outside the PA's reach. Under the Oslo Accords, this arrangement was supposed as a temporary measure, to be replaced by a final-status agreement by the year 2000, but it still remains in force. Several peace processes were initiated but none so far have been successful.

7. **In November 2012, the UN voted in favor of the Palestinian Authority's application for becoming a non-member observer state**. While opening the door to the PA to apply for membership in a number of UN agencies, the positive vote put an additional strain on its relationship with Israel. US facilitated Palestinian-Israeli peace talks restarted in mid-2013. By the end of March 2014, the peace talks began to stall. After Palestinian President Mahmoud Abbas forged a unity pact with Hamas (which formed the de facto authority in Gaza), Israel suspended its participation in the talks.

8. **In May 2014, a formal unity government between Fatah and Hamas was created, but it has been put under severe strain,** notably by the violence that erupted in Gaza in July-August 2014 and the hostility of both parties towards one another. This "consensus government" is composed of a cabinet of technocrats, who are not affiliated to any political party, and have been endorsed by both Fatah and Hamas. In practice, the ruling power is split into two separate administrations. The first is the Fatah-led Palestinian Authority, which rules the West Bank Areas A and has civil control over Areas B[3]. The other is the Hamas government, which is de facto administering the Gaza Strip, following violent conflict between Fatah and Hamas in 2007, which led to the expulsion of officials affiliated with Fatah out of the Gaza Strip and Hamas taking control of the area. Governance arrangements and service delivery in Gaza are complicated by the existence of two distinct public services —one paid and managed by the PA in Ramallah, and the other by the Hamas administration. Gaza's unemployment was 38% by the end of 2015 – twice that of the West Bank, with particularly high youth unemployment in 2015. Poverty was at 39% in 2014 (almost 2.5 times higher than in the WB). All movement of people and goods in and out of Gaza are restricted since June 2007 by both Israel and Egypt. The July-August 2014 conflict in Gaza created a humanitarian and economic crisis. At the current pace of recovery, the Gaza economy is not expected to rebound to its pre-war level until 2018. According to the United Nation's Relief and Works Agency, almost 80% of Gaza's population of around 1.8 million is currently aid dependent. The WB fares better than Gaza. However, by late 2015, 19% of the WB's population (estimated at 2.8 million in July 2015) was unemployed and 15% live below the poverty line. The persistence of administrative, trade, movement and access restrictions has had a dampening effect on private investment and private sector activity.

9. **The Palestinian Authority is committed to improving state-citizen relations through various mechanisms including complaints resolution,** "Regulation on Complaints No. 6" (hereafter: the Regulation), issued in 2009 by the Council of Ministers of the Palestinian Authority, establishes an internal system for handling citizens' complaints which is based on rights-based approaches. The

[3] The West Bank is divided into three zones: Areas A, B, and C. The land in Area A is entirely controlled by the Palestinian Authority. Area B is under Palestinian civil authority but is controlled by Israeli military forces. Area C is under complete Israeli authority.

regulation provides for the establishment of a Directorate General of Complaints (DGC) in the Council of Ministers. It also outlines the role, mandate and procedures of Complaints Units (CUs) in Palestinian ministries. As a result, 56 CUs have been established in various ministries and Governorates. These units receive complaints about programs and services being implemented by their ministries. According to the Regulation, the DGC is responsible for supervising all these CUs.

10. **The Regulation sets timeframes for CUs to resolve complaints.** CUs have three days to accept or reject a complaint. Then they have two weeks to resolve the complaint. If that is not enough time, then the CU informs the complainant that more time is needed to resolve the complaint. One month is allowed to resolve complaints.

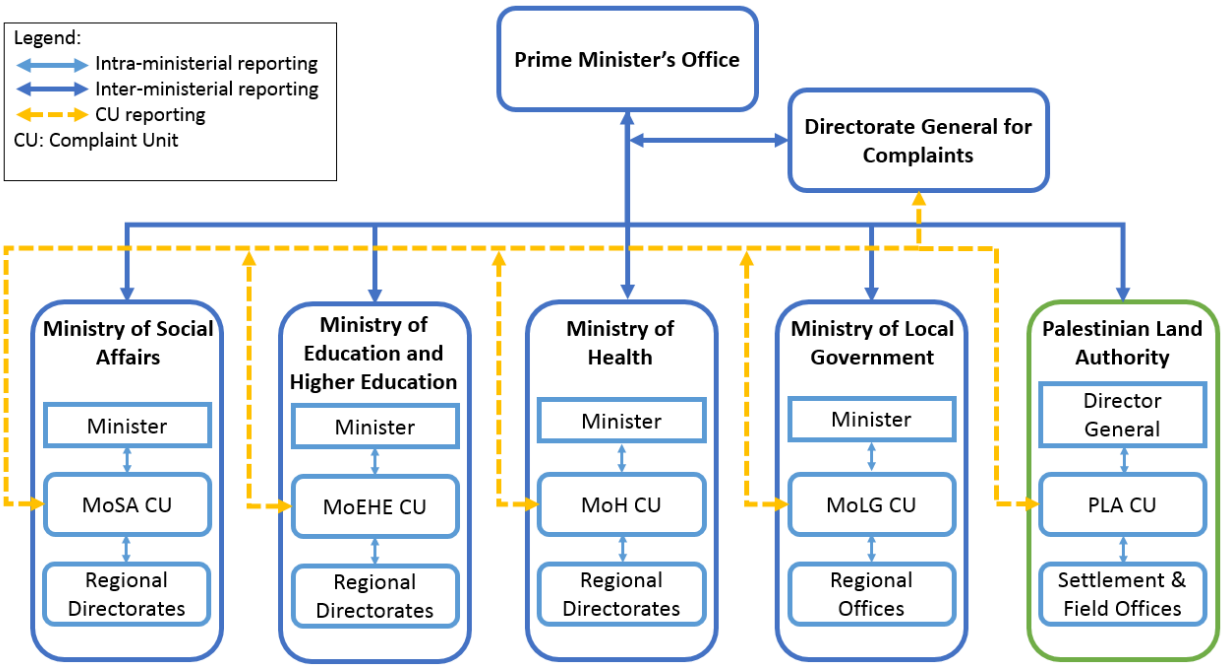
11. **The DGC's activities focus on complaints solving and providing support to the CUs in ministry and non-ministerial entities**. According to the Regulation, the DGC's duties are to: a) Receive public complaints from public institutions and organizations; b) review each case and discuss it with relevant parties to find solutions or send it to court in case no solution was reached through legal negotiations; and c) follow up on complaints regarding ministries' non-implementation of Supreme Court decisions in coordination with the General Administration for Legal Affairs. The DGC handles complaints that are referred to it, and appeals of complaints that ministry and lower level CUs do not resolve. The DGC also receives complaints directly from citizens. DGC provides training of CUs on how to run their units, develops procedures and bylaws on complaints handling, receives quarterly reports from ministry CUs, and produces quarterly and annual reports for the Prime Minister's Office (PMO). The DGC monitors and evaluates CUs, with a focus on problems or delays in complaint resolution. The DGC makes direct recommendations to the Prime Minister's Office, but its authority over Ministry CUs is limited. Given the DGC's strategic position in the Council of Ministers, several of its recommendations to the Prime Minister's Office have been received positively. Its recommendations generally focus on suggesting amendments to laws or regulations that impede complaint resolution. Ministry CUs are accountable to their respective Ministries but also report to the DGC.

12. **The DGC is developing an electronic Complaints Management System (CMS).** The CMS, once operational, will provide Ministry CUs with an overall database and replace the current system based on hard copies of complaints. It will allow online submission of complaints by citizens. Anonymous submission of complaints will be possible as well. It is expected that the CMS will improve complaint processing and tracking, and allow greater analysis of complaints statistics (e.g. percentage of complaints resolved by each ministry, areas where complaints are most frequent, etc.).

13. **The technical assistance supports the DGC and five selected ministries/non-ministerial entities in strengthening their CHM.** The World Bank portfolio in the Palestinian Territories comprises of 25 active projects and 15 pipeline projects.[4] Given the WB's institutional mandate on grievance redress and the PA's commitment and efforts to address complaints from Palestinian citizens, the World Bank decided to support the Complaints Directorate in strengthening complaints resolution in five selected ministries/non-ministerial entities that the World Bank is directly supporting through its projects. An integrated approach towards strengthening the PA's CHM is likely to result in higher cost savings, improved and sustained technical support, greater efficiency and effectiveness, and better project implementation.

[4] According to data from the operational portal on February 26, 2015.

Figure 1 – Complaints handling architecture in West Bank & Gaza



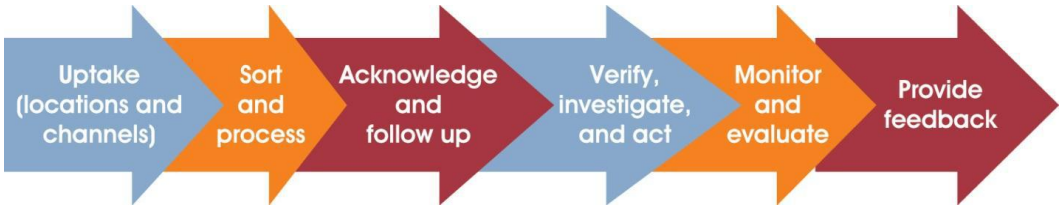
Source: Authors.

3. Methodology

14. **The technical assistance adopted an innovative methodology by combining a demand-side with a supply-side approach for CHM analysis in the five ministries/non-ministerial entities.** Rather than considering only the government's or only the citizens' view, it was recognized that it is essential to identify and combine both perspectives on the functioning of the CHM. Indeed, demand for good governance initiatives can only be successful if they take into account both (i) the willingness and capacity of government to be accountable, and (ii) the willingness and capacity of citizens to demand accountability.[5]

15. Regarding the supply side, **a preliminary analysis for each ministry was performed using the "Grievance Redress Mechanism Value Chain" framework for analysis** elaborated below.[6]

Figure 2 - Complaints Handling Value Chain[7]



[5] Sanjay Agarwal and Warren A. Van Wicklin III. 2012. How, When and Why to Use Demand-Side Governance Approaches in Projects. World Bank, Washington, DC

[6] See the May 2015 Aide-Mémoire.

[7] David Post and Sanjay Agarwal. 2012. Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects, Part 2. The Practice of Grievance Redress. World Bank, Washington, DC.

Each step of the grievance management process addresses different questions, such as – (i) ***Uptake*** – How is the grievance collected? At how many locations and through what channels? (ii) ***Sorting and processing*** – How is the grievance categorized, logged, and prioritized? Who is it referred to? How is the grievance addressed? (iii) ***Acknowledgement and follow up*** – Does the complainant receive an acknowledgement upon submission of grievance? How are they provided progress updates? Are complainants informed of the timeline and process to address their grievance? (iv) ***Verify, investigate, and act*** – How is information about the grievance gathered to resolve it? How is the grievance resolved? How is the grievance escalated to higher levels? (v) ***Monitoring and evaluation*** – How is the grievance tracked by management? Is grievance data analyzed? Does management get regular reports on grievance receipt and resolution trends? Is grievance gathering an agenda item in management meetings? (vi) ***Provide feedback*** (to the complainants) – Are complainants informed of the action(s) taken on their grievance? How? Is information on the grievance and the action(s) taken made available to other citizens/beneficiaries?

16. **Supply side perspectives were obtained through interactions with government officials.** Two missions have been undertaken as part of this technical assistance, the first from May 18-29, 2015, and the second from February 8-18, 2016. The first mission focused on meetings with CU staff in the four ministries, the PLA and the DGC, as well as with beneficiary groups, regional offices, etc. It closed with a half-day validation workshop, which brought the heads of all six CUs together and allowed them to share strengths, challenges, concerns and experiences with their own CHMs. Participants also identified priority actions to strengthen their CHMs.

17. **Demand side perspectives were obtained through a survey of complainants and focus group discussions with program beneficiaries.** The Palestinian branch of Transparency International, AMAN, given its relevant experience and relationships with the relevant Ministries, was selected to carry out a survey of citizens' experiences and perceptions of various CUs and complaint handling procedures. Additionally, meetings and focus group discussions with program beneficiaries, parent/beneficiary councils and NGOs provided deeper insights that supplemented survey findings.

18. **The survey carried out by AMAN examined several aspects of CHMs**, ranging from knowledge about the CU, to methods used to file complaints, timeliness, ease of follow-up, satisfaction with outcomes, etc. (see Box 1). It comprised a face-to-face exit survey of visitors to the five target ministries (sample size: 1,656), as well as a telephone survey which targeted individuals who had submitted complaints (sample size: 635). The latter were identified from the complainants' database available at the four target ministries and PLA, both in the West Bank and Gaza Strip[8] (see Table 1). In Palestine, most complainants prefer to air their complaints verbally but do not submit complaints in writing as a result of which most complaints are not registered in the CU databases. To account for this, the face-to-face exit survey also included non-complainants. Further, focus group discussions were held and interviews conducted with Parents Council members (for MoE); Beneficiary Council members (for MoSA); complainants who approached the AMAN office and agreed to take part in focus group discussions; and the Independent Human Rights Commission (IHRC). Meetings and interviews with officials from the 4 targeted ministries and PLA (from the CUs, as well as the public relations, legal, administrative, and internal audit departments); Ramallah hospital administrators (MoH); Ramallah Municipality; Gaza Municipality; and lawyers, completed the picture.

Box 1 - Topics covered by the user survey

- Knowledge about the Complaints Unit
- Method of filing complaint at Ministry
- Other Non-Ministerial parties that citizens filed complaints to
- Information about procedures to file a complaint and follow-up mechanisms
- Treatment by the CU - Respectful, neutral and non-discriminatory
- Ease of access to CU and inquiry about CH procedures
- Provision of information on CH by CU
- Timeliness in resolving complaint
- Communication of complaint result
- Ease of follow-up
- Satisfaction with resolution
- Appeals, if any
- Suggestions for improvements

Table 1 - Number of respondents

Name of Ministry/ Institution	Number of respondents for the **face-to-face survey** in the WB	Number of respondents for the **face-to-face survey** in the GS	Number of respondents for the **phone survey** in the WB	Number of respondents for the **phone survey** in the GS
Social Affairs	298	171	229	58
Education	104	128	86	50
Health	235	124	58	24
Local Government	144	112	23	59
Land Authority	234	106	8	40
Total	1,015	641	404	231

19. **The key findings and suggestions for improvement were discussed and refined in a validation workshop.** The second mission closed with a workshop which brought together officials from the four ministries, the PLA and the DGC. The workshop included progress updates by representatives from the participating ministries and broadly validated the findings of the AMAN survey. The participants also

[8] In the West Bank, the complainants' databases were provided by the CUs of all Ministries and the PLA. In the Gaza Strip, the complainants' databases were provided by the CUs of all Ministries as well, except in the case of the PLA and MoSA, where the databases were provided by the Internal Audit Units.

identified priority actions that they could undertake in the next 6-9 months to further improve their CHMs. These findings and suggestions for improvement are summarized in Parts 5-7 below.

4. Key findings

20. The findings presented in this section build on the ministry-by-ministry assessments carried out during the two missions to the Palestinian Territories, and the **May 2016 "*Status, Effectiveness and Efficiency of Palestinian Complaint Units*" background report produced by AMAN** that summarizes the survey results. The section starts with a summary of key findings, then outlines the findings of the face-to-face survey, and moves on to the findings of the phone survey. While people surveyed face-to-face were citizens exiting the respective ministry offices and comprised a mix of both complainants and non-complainants, respondents for the phone survey were identified through databases of complainants covering the period 2014-August 2015, provided by the respective CUs or internal audit units.[9] Data for the WB and GS are presented in separate graphs. This is to account for differences in the governance systems in the two territories and to allow greater granularity. The findings are not intended for an inter-regional (i.e. West Bank vs Gaza Strip) comparison as the contexts and governance arrangements are quite different. Similarly the findings are not intended for inter-ministerial (i.e. MoE vs. MoH vs. MoSA vs. MoLG vs PLA) comparisons as the programs/services offered by each Ministry of the PLA are very different. For some of the observations made, additional time and research will be required to test causal relationships and explain variations in patterns, for example between various ministries in the same territory, or between the WB and GS for the same ministry. A summary of the key survey findings is provided in Table 2. The findings are discussed in more detail later.

Table 2 – Summary of key findings

Findings from complainants and non-complainants in the face-to-face survey
FACTORS FACILITATING GRIEVANCE UPTAKE ⇨ **Awareness of procedures**. With the exception of the PLA in the WB, it appears that two thirds or more of respondents are aware of the procedures to file a complaint with a CU. ⇨ **Willingness to appeal**. Over half of complainants dissatisfied with the result of their complaint intend to appeal against it, reflecting a readiness to use the complaint management system and a certain degree of trust in it. **FACTORS LIMITING GRIEVANCE UPTAKE** ⇨ **If you don't know, you don't go.** Overall awareness of the CU is low and can be enhanced (especially in the WB). In the WB, 40-60% of respondents know of the CU's existence. In the GS, 60-70% are aware of it. Even if they are aware of the CU, many do not know the procedures for filing complaints. ⇨ **Three main reasons emerge why citizens do not want to file a complaint with the Ministry:** **1) Time is money**. More than one fifth of citizens say they do not want to file their complaint with the ministry because of the slow pace of procedures. **2) It's who you know that counts**. More than one fifth of citizens say they do not want to file their complaint with the ministry because of the frequent occurrence of personal mediation, which leads them to believe that the system is corrupt. **3) Trust takes years to build and seconds to break.** A third major group of respondents say they

[9] For the GS PLA and MoSA

do not want to file a complaint because they do not trust government performance.

- ⇨ **Kafka's legacy.** Apart from the MoH, the GS MoE and the GS MoSA, over one third of citizens who filed their complaint somewhere else than the CU, did so because they perceive approaching the ministry with their grievance as a highly bureaucratic procedure.

IMPORTANCE OF NON-MINISTRY ACTORS

- ⇨ **Second-hand information about the CU.** Over half of the respondents say they learned about the CU from a source other than the ministries.
- ⇨ **Trust that non-ministry entities can handle the complaint well.** Citizens think of third parties as very relevant and credible alternatives to the CU for filing complaints. Between 20 and 50% of face-to-face complainants have filed their complaint to another party before heading to the ministries. In the WB, they mostly filed complaints with the DGC and private institutions/human rights NGOs. In the GS, they mostly turned towards the DGC and the Anti-Corruption Commission.
- ⇨ **The need for outside help.** Apart from respondents for the PLA, more than one fifth of respondents say that they submitted their complaint to another party because of the perceived need for technical and legal support. A significant percentage of respondents is also seeking help from outside the ministry to get updated information on the status of their complaints.

Findings from complainants in the phone survey

KEY FACTORS IMPACTING CITIZENS' EXPERIENCE

- ⇨ **Customer service.** Complainants generally believe that CU staff has been respectful, neutral and non-discriminatory. In the Gaza Strip, however, a large number of respondents state gender-based discrimination as one of the reasons for dissatisfaction with CU staff. Additional reasons include the absence of a "first-come-first-served" rule and more attention given to some complainants. Complainants who are unclear about procedures and follow-up mechanisms also tend to blame uncooperative CU employees. A signification proportion of complainants in the Gaza Strip also point out that the physical space where they can file their complaints is not suitable and that the complaint form provided by the ministry is too complex or missing.
- ⇨ **Communication about procedures.** Complainants in the GS tend to agree much more than those in the WB that the CU has informed them clearly about procedures and follow-up mechanisms related to their grievance (63.8% or more in the GS, versus between 13% and 62.5% for the WB).
- ⇨ **Communication about status updates and results.** Agreement about ease of access of the CU to inquire about complaint handling procedures is mixed. Citizens who did not find it easy to get in touch with the CU mention unwillingness of CU employees to offer information, lack of updated data, length of time it takes to retrieve the complaint, and staff absenteeism as reasons for their dissatisfaction. In addition, citizens often express the impression that they did not receive all the necessary information about their inquiry on complaints handling, especially in the WB. The same is true for the communication of results.
- ⇨ **Satisfaction with outcomes.** Satisfaction rates with complaint resolution outcomes are quite low in the West Bank (the highest satisfaction rate is 37.5% for the PLA, the lowest 12.3% for the MoH), but relatively higher in the Gaza Strip (between 34.5% for the MoSA and 79.2% for the MoH).
- ⇨ **Timeliness**. Satisfaction rates with the timeliness of complaints handling remain fairly low overall, though they are systematically higher in the GS than in the WB (no higher than 50% for the WB; no higher than 65% for the GS).

COMPLAINANTS' CHOICES IMPACTED BY CURRENT PROCESSES

- ⇨ **Likelihood to turn again to the CU.** The likelihood that complainants will turn to the CU again if a problem re-occurs varies between 41.4% and 77.8% in the WB, and between 45.8% and 65%

in the GS. This is mostly linked to a perception of lack of professionality of the CU (especially pronounced in the WB) and dissatisfaction with results.

⇨ **Complainants' search for internal and external assistance.** In the WB, up to one fourth of citizens asked ministry employees or external officials to follow-up on their complaint. If dissatisfied with the CU, a significant proportion of citizens would choose to approach the DGC. In the GS, around one third of respondents addressed ministry employees/officials, or external employees/officials to seek help on their complaint. If unhappy with the CU, many respondents say they will turn to the Anti-Corruption Commission or the State Audit and Administrative Control Bureau.

RECOMMENDATIONS FOR IMPROVEMENT

⇨ In the GS, respondents widely recommend improving **citizen awareness programs** regarding complaint procedures (13-43% depending on the ministry), **simplifying processes** (22-38%), **increasing the number of CU employees** (15-38%) and **mainstreaming digitalized procedures** (12-19%). In the WB, priorities for improvement are less clear (over 40% of respondents in each ministry recommend taking "**other" measures**).

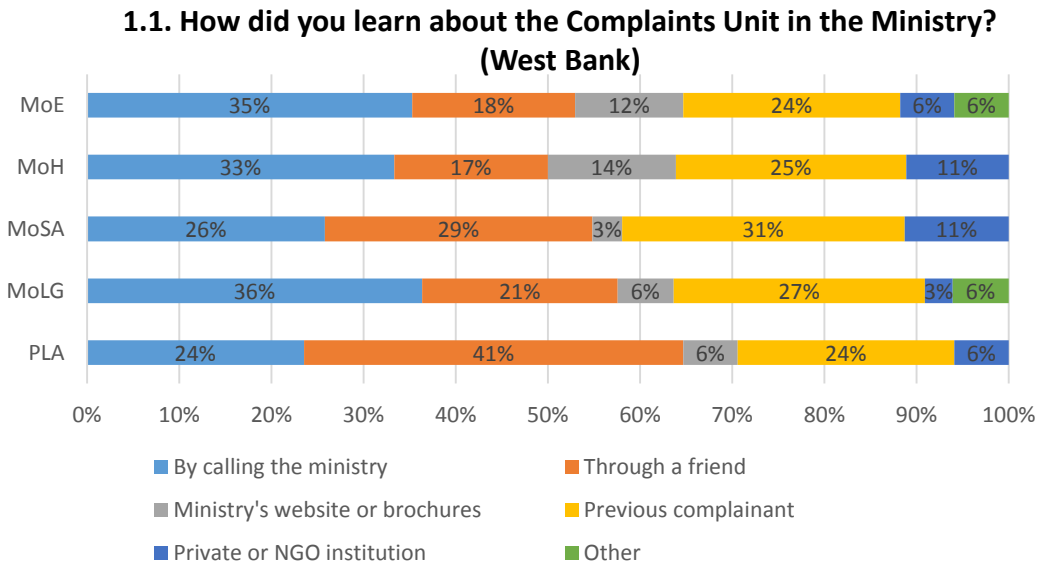
21. **The number of complaints received by CUs increases if they are empowered and communicate better.** Most CUs do not receive too many complaints formally (see Table 3). This is due to the fact most complainants prefer to air their complaints verbally but do not submit complaints in writing. This implies that these complaints are not registered in the CU database. To illustrate, MoSA has three different types of formal and informal mechanisms to receive and respond to complaints. The first, which is formal and quite effective involves the CU, which is entrusted with the responsibility of receiving, responding and resolving all complaints. In the second, written complaints are received by MoSA operational staff at the national and the regional levels, investigated and responded to. The complaints received through this mechanism are not captured in the complaints MIS or reported to the CU. However, cases are opened for these complaints and documented in regional offices. Data on these complaints is not readily available. Finally, the third mechanism deals with verbal complaints received by MoSA operational staff at all levels. There is no documentation for complaints received verbally and so no tracking, monitoring or analysis is possible. However, this is the most common channel with informal estimates of the number of complaints. The recent interventions by MoSA and MOE (see boxes 1 and 2) which have empowered the CUs in these ministries has led to an increase in the number of complaints received by the CU.

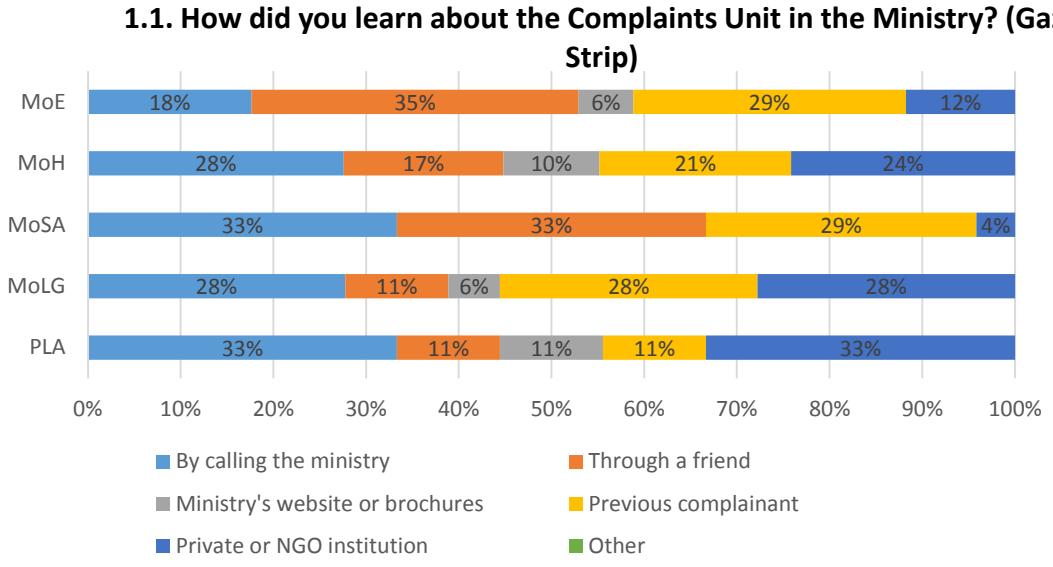
Table 3 – Complaints received by Complaint Units in the West Bank[10]

Entity/Year	2013	2014	2015
MoSA	691	371	399
MoE	345	314	1,160
MoLG	644	123	355
PLA	17	20	6
MoH	83	76	77

[10] Data for the Gaza Strip was not readily available.

***Overall findings based on the face-to-face survey*[11]**



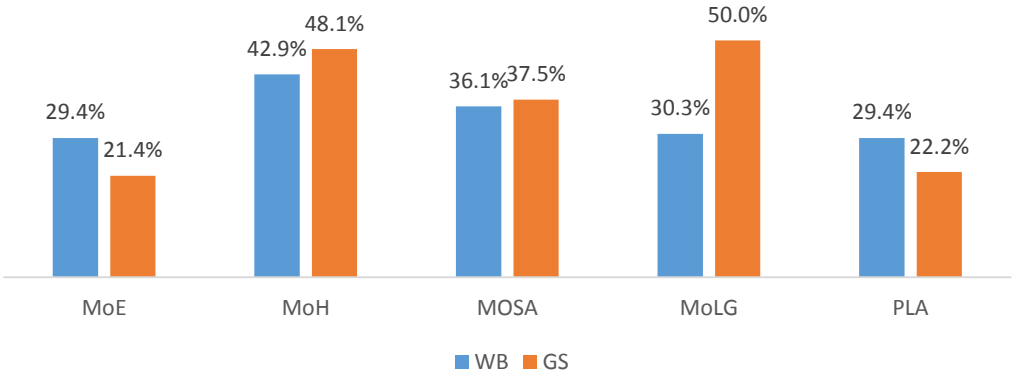


22. **More than half of the citizens learn about the complaints units from a source other than the Ministries.** Across all ministries, information about the CU is often passed on through personal acquaintances or previous complainants, rather than documentation issued by the ministries, which,

[11] The graphs beginning with 1 (i.e. 1.1, 1.2, etc.) summarize the responses from face-to-face interviews with citizens who came to file a complaint. The graphs beginning with 2 (i.e. 2.1, 2.2. etc.) summarize the responses from face-to-face interviews with citizens who came for any other reason other than filing a complaint. Citizens who visited the ministry without filing a complaint were also interviewed in order to capture perceptions and levels of awareness of the CU by individuals who may not have had anything to complaint about to date.

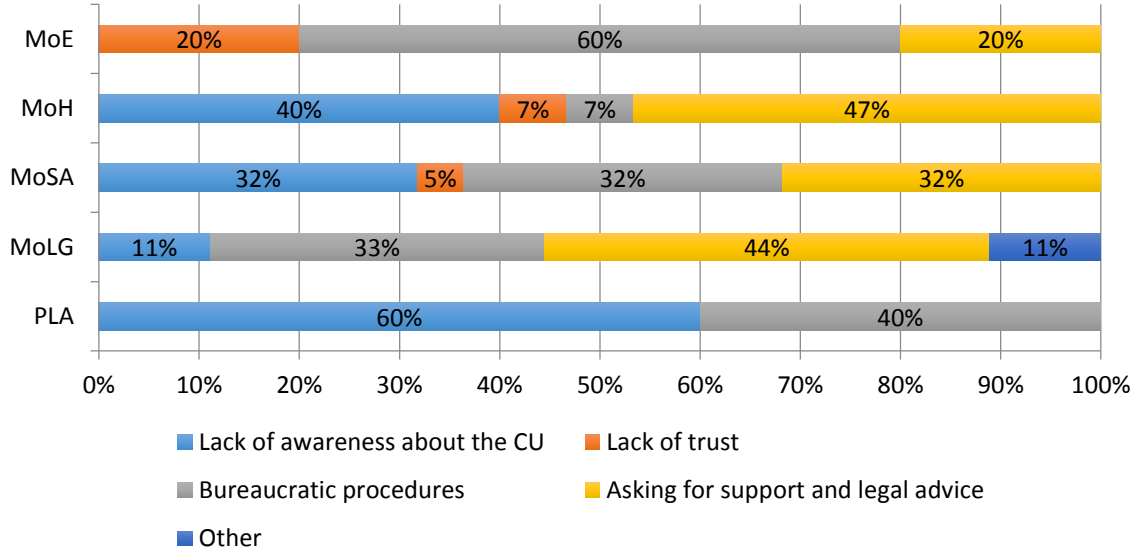
overall, seem to provide information to only about one third of respondents. These results point out deficiencies in the communication strategies of the ministries, in particular regarding their online presence, which could be developed to clearly highlight the existence and role of the CU, as well as ways to contact it. (See figure 1.1.)

1.2. Percentage of respondents who have filed their complaint to another party before heading to the Ministry

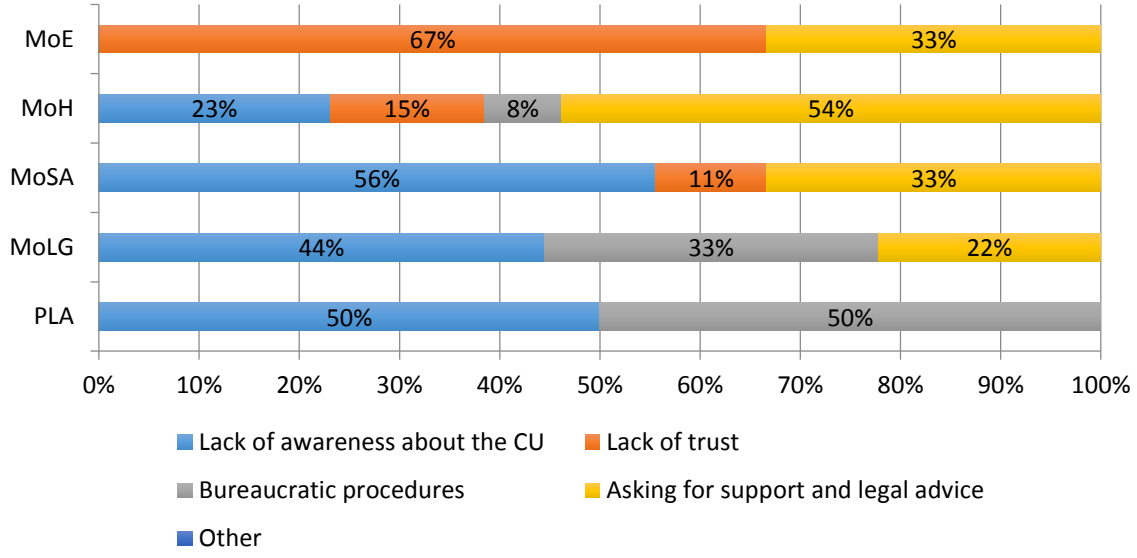


23. **On average, in about one third of recorded cases, citizens have submitted complaints to entities (departments/sections/other bodies) other than the CU.** This highlights low citizen knowledge and/or trust in the ministries' complaints units, and may also be linked to insufficient communication about (a) what a complaint is; (b) what the role of the CU is, including in respect to other bodies and ministries; (c) how citizens can locate and benefit from the CU. In the WB, percentages of respondents who filed their complaints elsewhere range from 29.4% (MoE) to 42.9% (MoH). In the GS, these percentages range from 21.4% (MoE) to 50% (MoLG). (See figure 1.2.)

1.2a. Why did you file your complaint to another party? (West Bank)

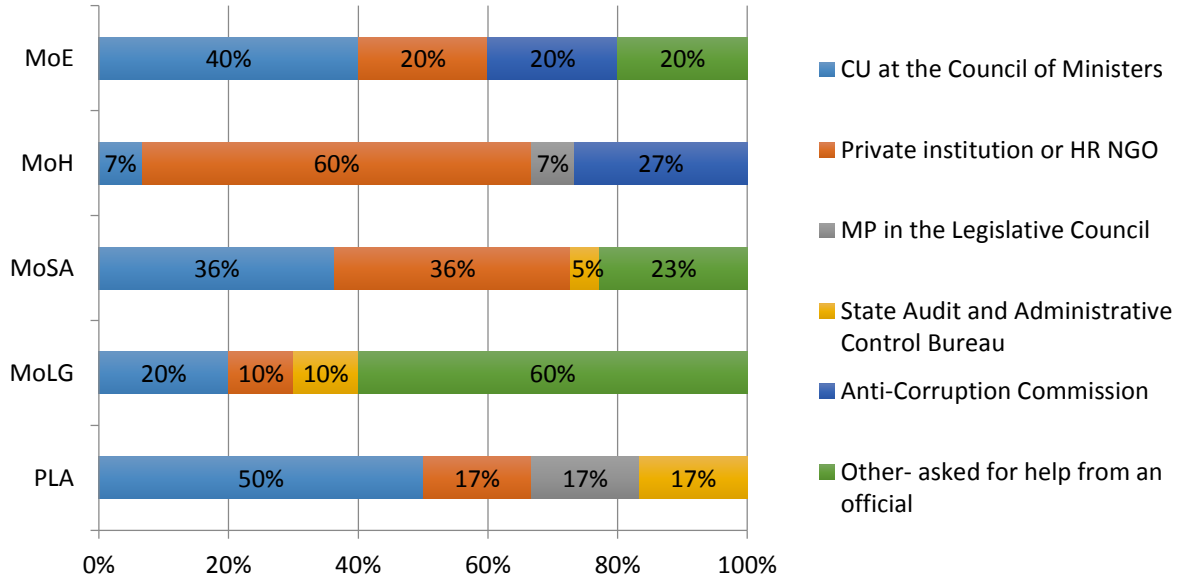


1.2a. Why did you file your complaint to another party? (Gaza Strip)

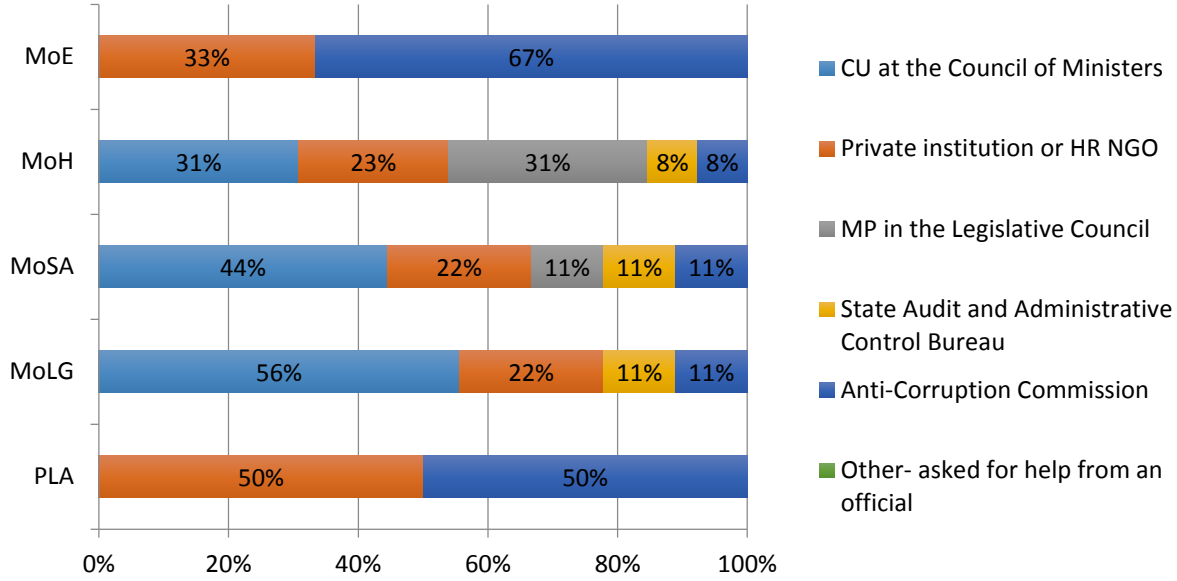


24. **The impression of highly bureaucratic procedures, and the perceived need for technical and legal advice, deter citizens from submitting their grievance to the CU.** These two trends can be identified in the graph above (see figure 1.2a.): first, apart from the MoH and the GS MoE, there seems to be a widespread perception that filing a complaint with a ministry's CU is a very bureaucratic procedure; and second, a significant percentage of respondents have highlighted their desire to receive additional support and legal advice (except for the PLA), and believe they cannot receive it at the CUs. Two conclusions can be derived from these findings: first, grievance uptake procedures can be further simplified, so that citizens would not be discouraged from submitting their complaints to the CU; and second, CUs could inform citizens better about the array of assistance mechanisms that are at their disposal, including for example regarding legal support. Another insight provided by the graph is the widespread lack of awareness about the CU, with the exception of the MoE CU.

1.2b. You filed your complaint to... (West Bank)

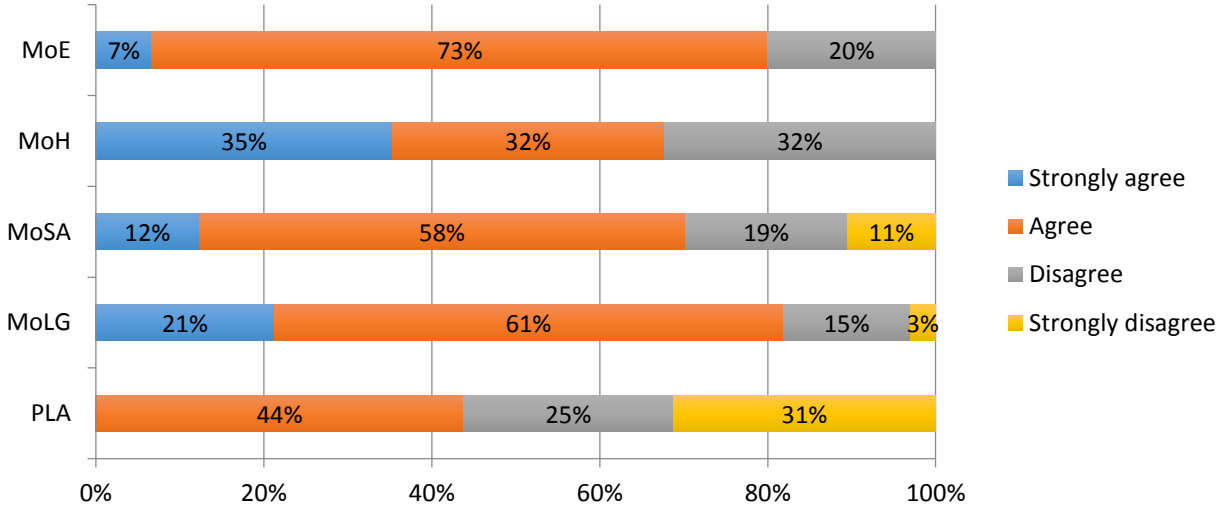


1.2b. You filed your complaint to... (Gaza Strip)

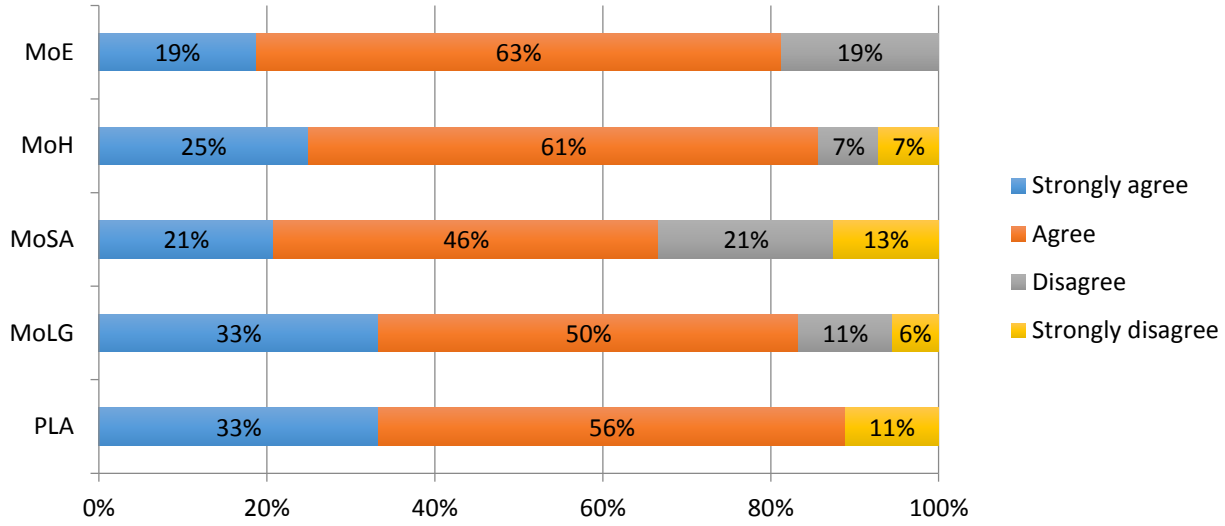


25. **Citizens take their complaints to a variety of entities other than CUs.** In the WB, citizens tend to turn primarily to private institutions/human rights NGOs or the Directorate General for Complaints when they file their complaint elsewhere than the Ministry CUs. Regarding complaints addressed to the MoLG, 60% of citizens also ask help from officials, possibly at other levels (e.g. municipalities). In the GS as well, private institutions/human rights NGOs or the Directorate General for Complaints are often solicited. For complaints related to the MoE and PLA, more than half of GS respondents also turn towards the Anti-Corruption Commission. Therefore it seems that the relationship and difference between CUs and other entities frequently receiving complaints, such as the Independent Commission for Human Rights (ICHR), is unclear. Even within the Ministry structures, citizens seem to be confused about the roles and responsibilities of the various entities involved in CHMs (from senior management, to CU staff, other departments, regional directorates, Directorate General for Complaints etc.). (See figure 1.2b.)

1.3. You had previous information about the procedures to file a complaint. (West Bank)

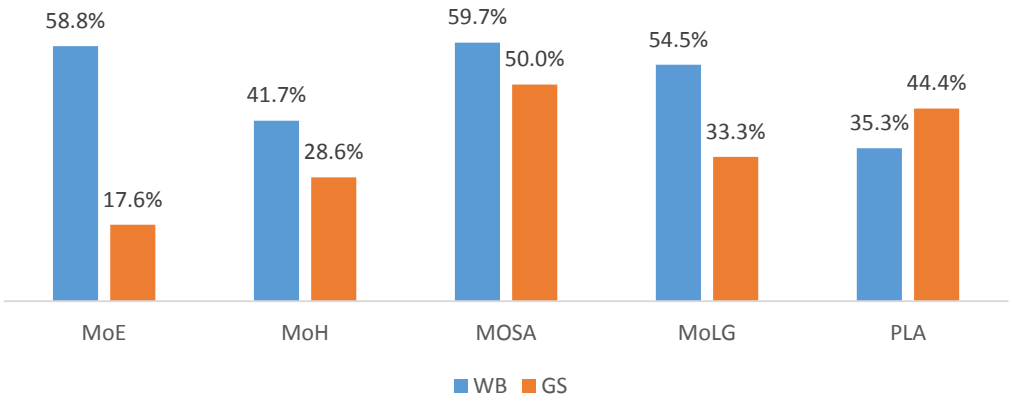


1.3. You had previous information about the procedures to file a complaint. (Gaza Strip)



26. **With the exception of the PLA in the WB, it appears that two thirds or more of respondents are aware of the procedures to file a complaint with a CU.** In the WB, awareness levels of procedures range from 44% to 82% (this includes respondents selecting both agree and strongly agree), depending on the ministry/government entity. In the GS, four out of five percentages are actually above the 80% threshold, revealing a quite widespread knowledge of complaint filing procedures. (See figure 1.3.)

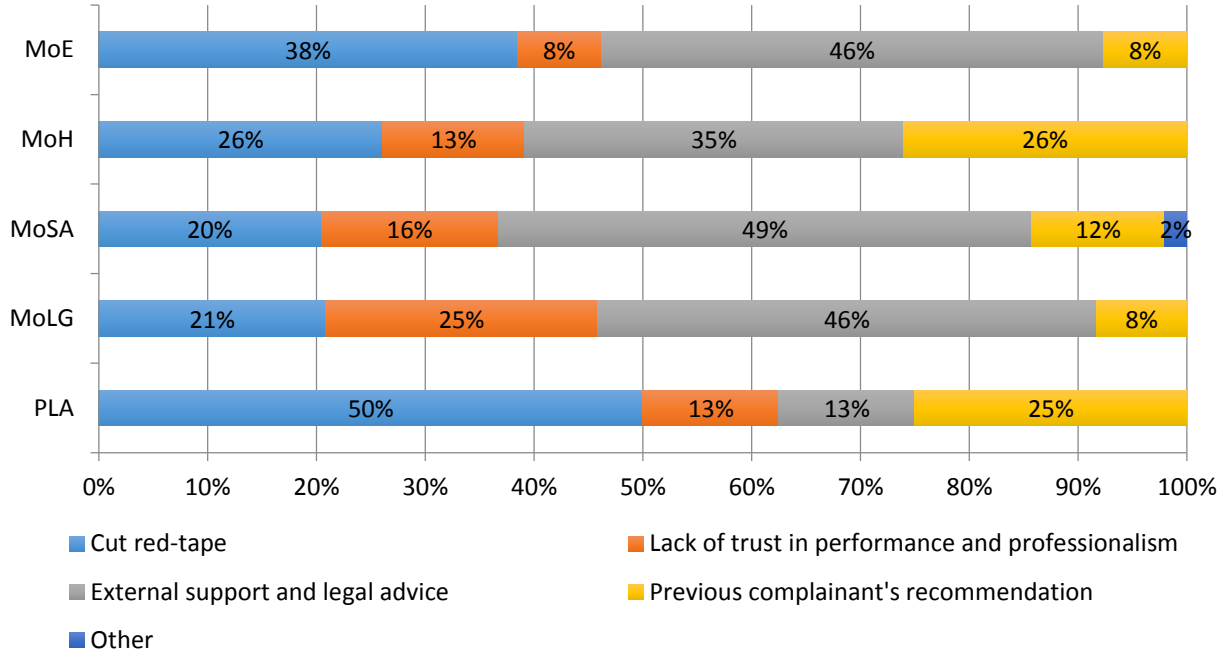
1.4. Percentage of respondents answering"yes" to the question: *"Did you seek help from an employee or official outside the ministry to follow up on your complaint?"*



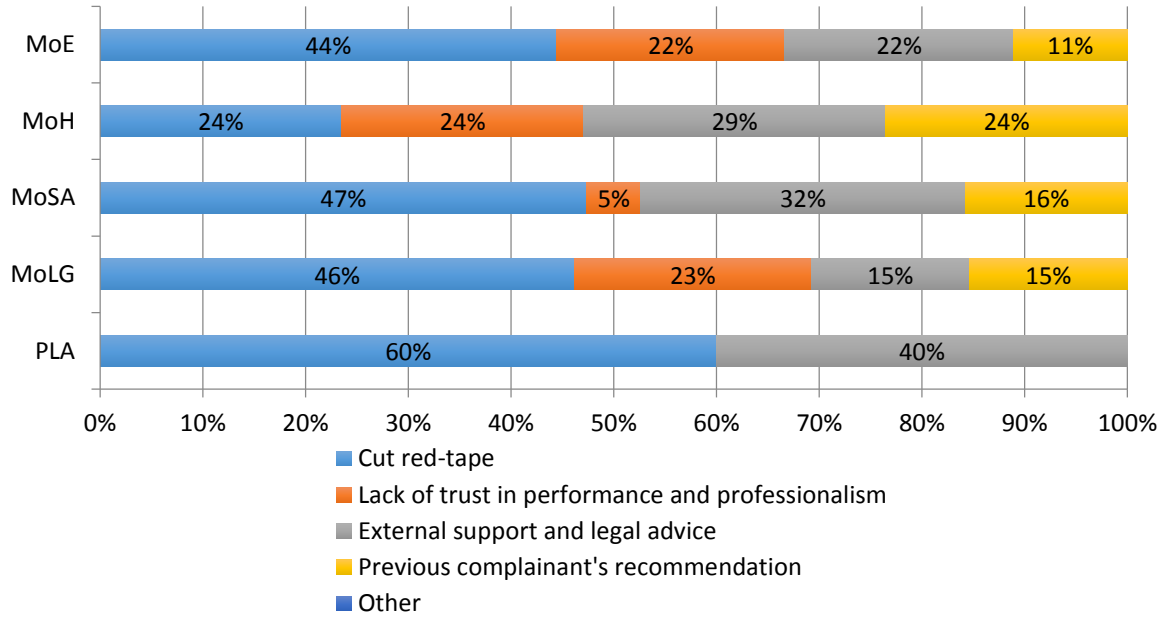
27. **A significant percentage of respondents is seeking help from outside the ministry to get updated information on the status of their complaints**, which points towards insufficient ministry communication, clarity and accessibility regarding follow-ups on individual complaints. In the WB, between 35.3% (PLA) and 59.7% (MoSA) of respondents have sought outside help to follow up on their complaint. These percentages are lower in the GS, where between 17.6% (MoE) and 50% of citizens (MoSA) have sought external support. These results suggest that CUs can do a better job in spreading the

message that they are obliged to respond to grievances and will act upon them as part of the overall trust-building exercise towards citizens. (See figure 1.4.)

1.5 Main reason to seek external (third party) help to follow-up on a complaint (West Bank)



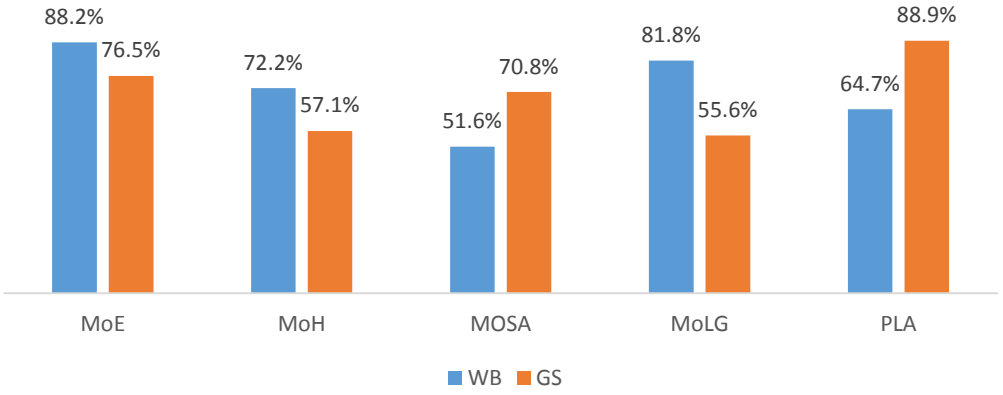
1.5 Main reason to seek external (third party) help to follow-up on a complaint (Gaza Strip)



28. **In addition to the perceived amount of bureaucracy involved in submitting and following-up on the status of a complaint to the CU, many citizens are unsure about the degree of support and legal**

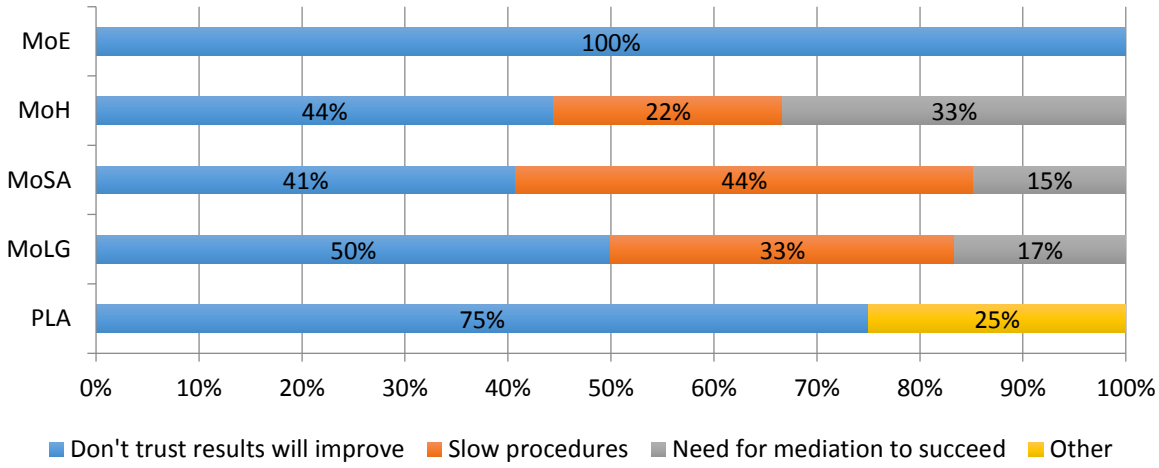
advice they may receive from ministries' CUs. The negative experience of previous complainants also influences the behavior of potential complainants. (See figure 1.5.)

1.6 Percentage of complainants dissatisfied with the result who are planning to appeal

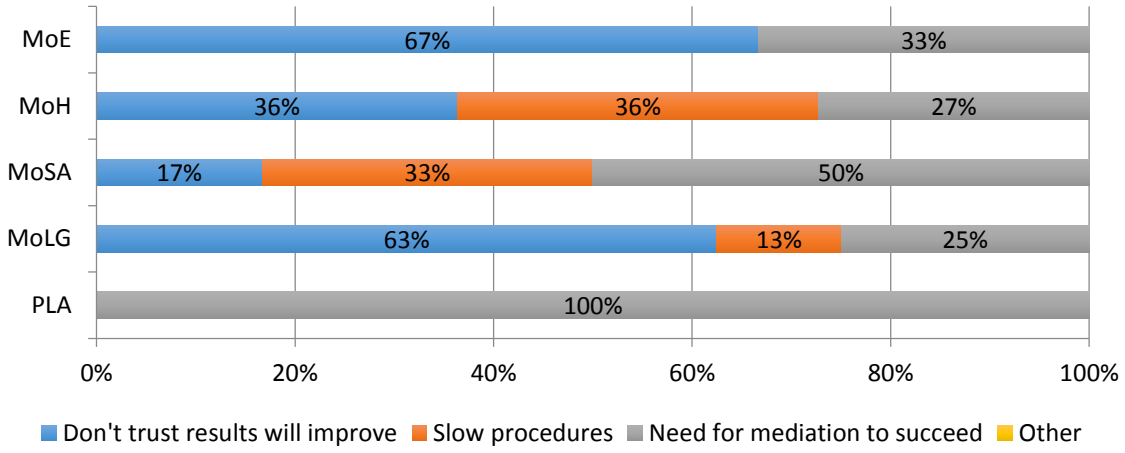


29. **More than half of complainants dissatisfied with the result of their complaint intend to appeal it.** Given the time and resources implied in an appeal process, these results are significant as they reveal that complainants are unhappy with the quality and outcomes of resolution. (See figure 1.6.)

1.6a. Reason indicated by complainants disatisfied with the result why they will *not* appeal the result (West Bank)

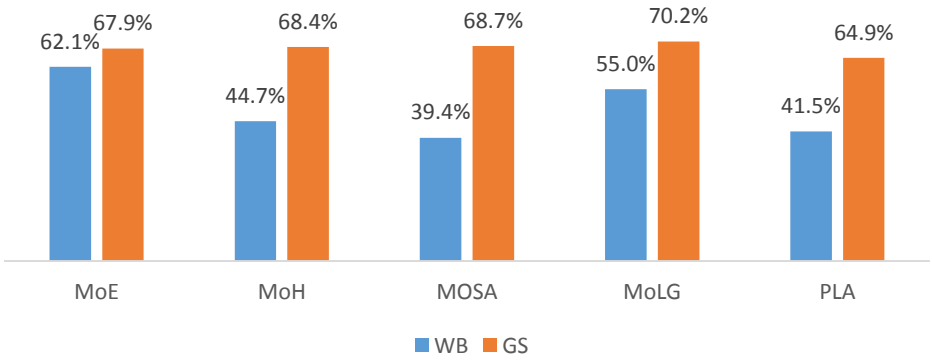


1.6a. Reason indicated by complainants disatisfied with the result why they will *not* appeal the result (Gaza Strip)



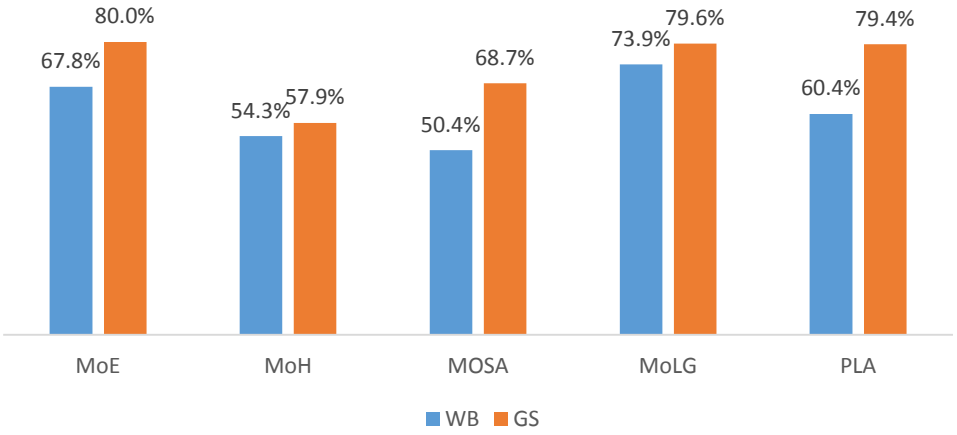
30. **Reluctance to appeal reveals a general lack of trust in the system, which many citizens perceive as corrupt and slow.** In the WB, the main reason why citizens do not want to appeal is the lack of hope that results would improve, followed by the perception that procedures are slow. In the GS, more than one fourth of respondents believe that their appeal cannot succeed without interference/mediation by personal connections (*wasta*). This highlights the low level of confidence amongst respondents in the CU and its processes. (See figure 1.6a.)

2.1. Percentage of respondents who knew about the Ministry's Complaints Unit

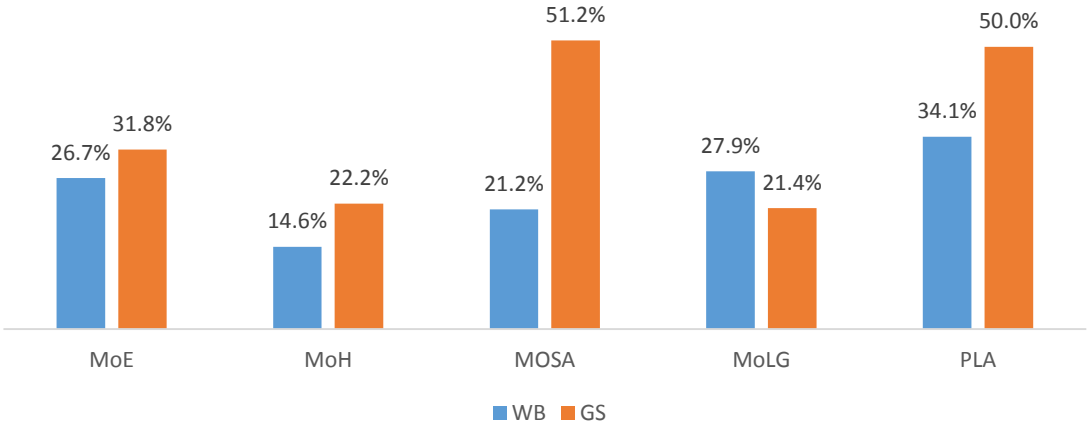


31. **Overall awareness of the CU is low and can be enhanced.** In the WB, percentages range from 39.4% for the MoSA to 62.1% for the MoE. In the GS, percentages range from 64.9% for the PLA to 70.2% for the MoLG. Evidently, the awareness of CUs in GS is higher than in the WB. The graph shows that further improvements in terms of communication about the CU are still required. (See figure 2.1.)

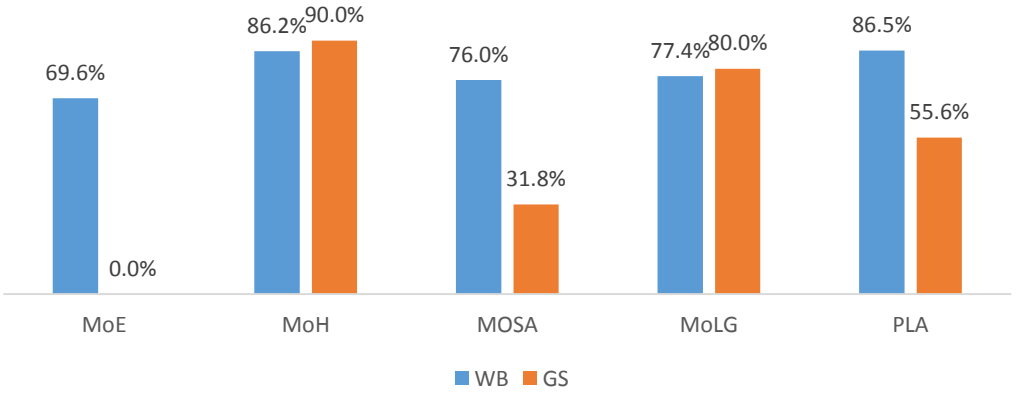
2.2. Percentage of respondents who would file a complaint to the Ministry if faced with a problem



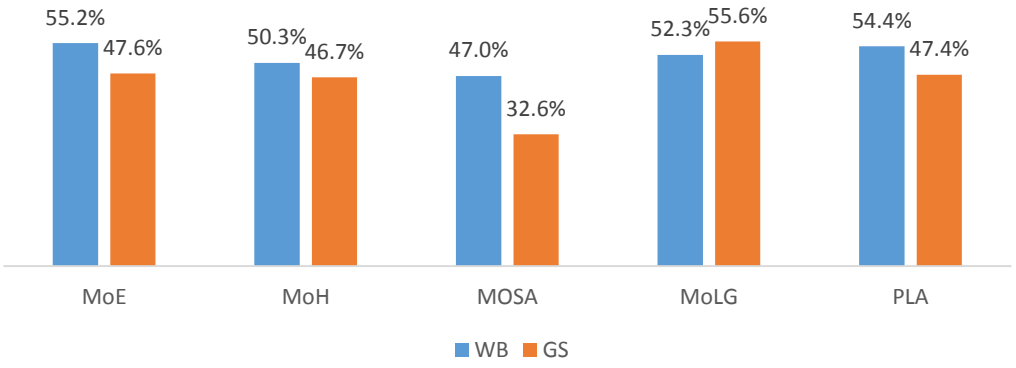
2.3. Percentage of respondents who have faced a problem linked to Ministry service delivery but resorted to a third party to solve it



2.3a. Percentage of respondents who filed a complaint at a third party and whose complaints were subsequently resolved

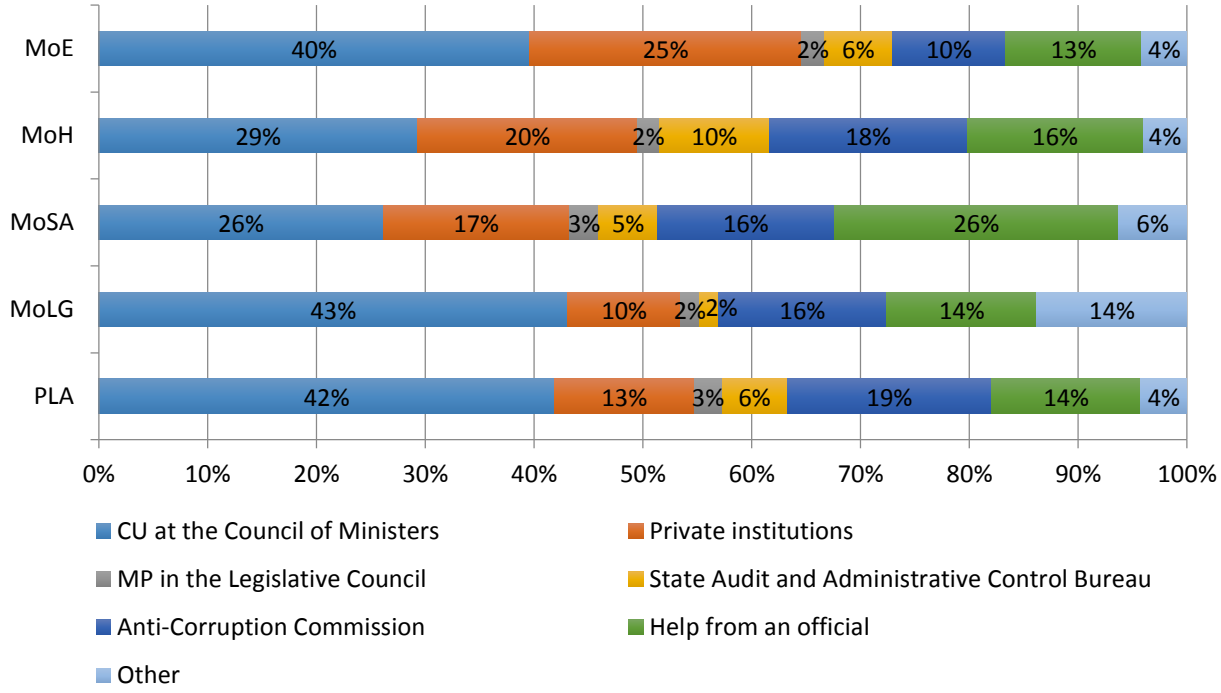


2.4. Percentage of respondents who would file a complaint with a third party in case they do not desire to file it with the Ministry

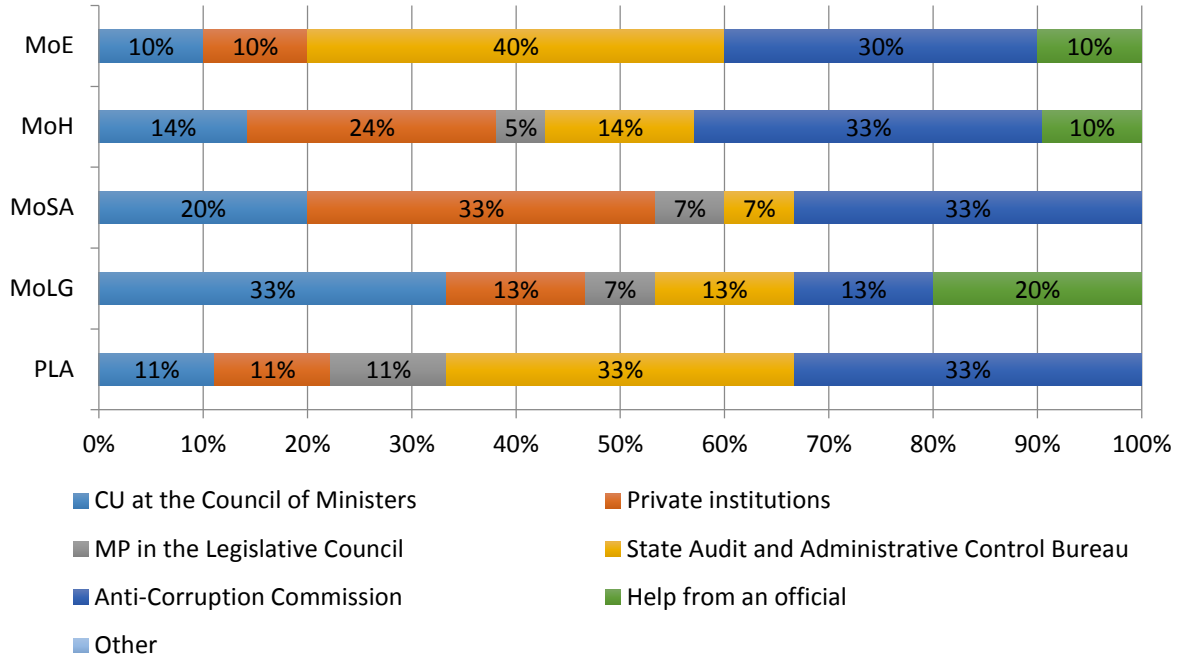


32. **Citizens still think of third parties as very relevant and credible alternatives for filing complaints, in comparison to the CUs** (as highlighted by figures 2.2-2.4). These findings may partly be due to the absence of community-specific communication strategies to allay mistrust and unwillingness to submit grievances to the CU directly, for example through intermediaries (e.g. CSOs). It appears that citizens in the GS are more willing to submit complaints to the CU than in the WB, but also resort to third parties more frequently to solve ministry-related problems than in the WB. Graph 2.3a shows that complaint resolution rates by third parties are quite high in the WB (consistently around or above 70%). In the GS, they vary between 31.8% for MoSA and 90% for MoH.

2.4a. Third parties where respondents would file a complaint if dissatisfied (West Bank)

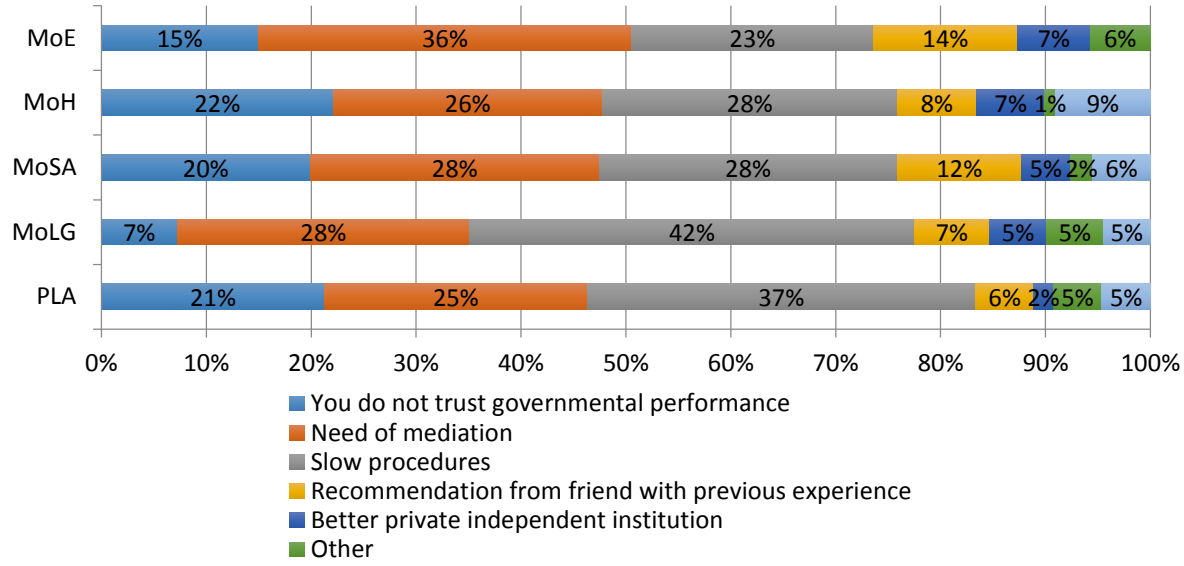


2.4a. Third parties where respondents would file a complaint if dissatisfied (Gaza Strip)

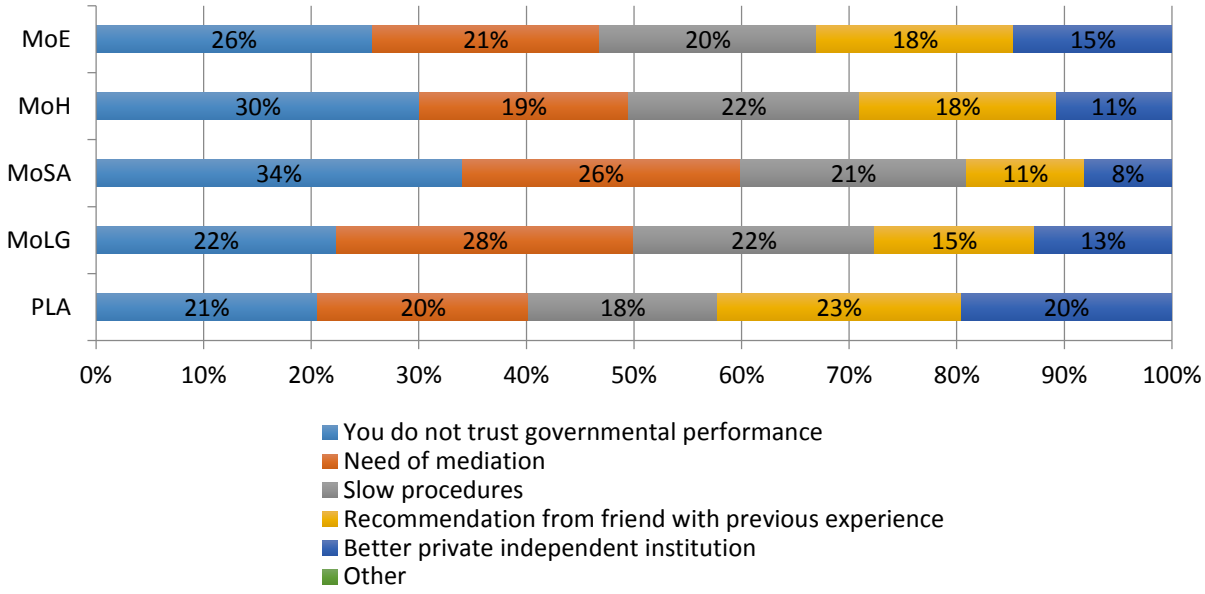


33. **A significant proportion of dissatisfied citizens in the WB would choose to approach the Council of Ministers' Complaints Directorate, while in the GS, they would primarily turn to the Anti-Corruption Commission or the State Audit and Administrative Control Bureau to file a complaint**. The results show that a variety of other actors are approached by dissatisfied users. These include officials, private institutions, or (but more rarely) MPs. (See figure 2.4a.)

2.5. Reasons indicated by citizens why they do not want to file a complaint with the Ministry (West Bank)



2.5. Reasons indicated by citizens why they do not want to file a complaint with the Ministry (Gaza Strip)

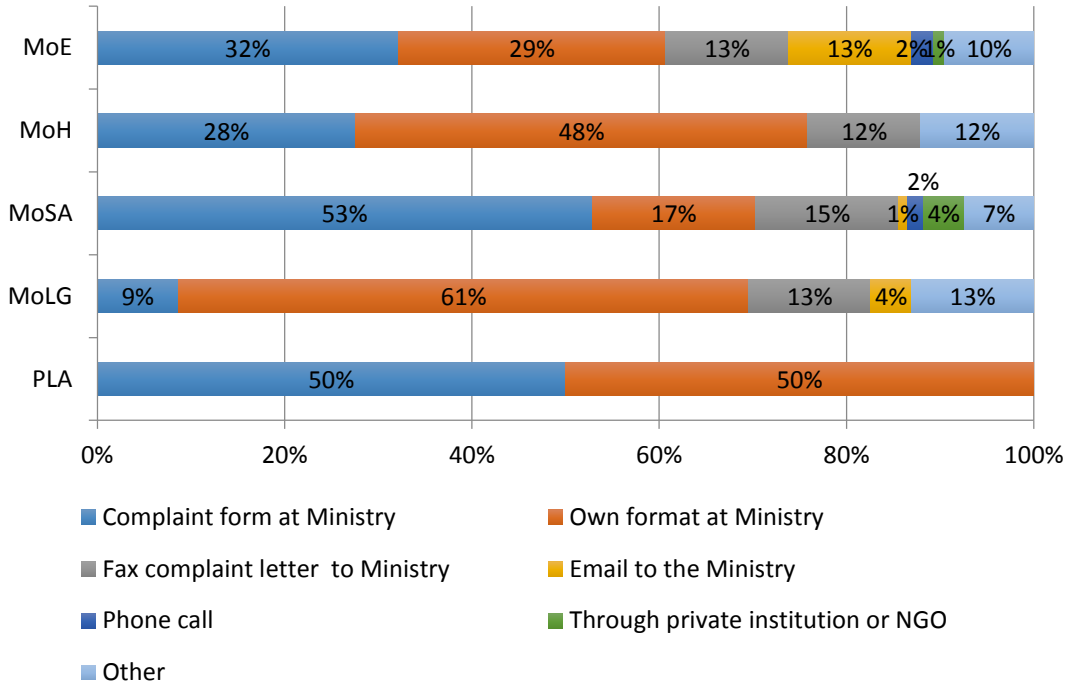


34. **The length of procedures, frequent occurrence of personal mediation, and low trust in government performance, all harm citizens' willingness to submit complaint with CUs**. Around one fifth of citizens (or more), across ministries, perceive procedures as "slow", which underlines the fact that current grievance response systems are not timely enough. Around one fifth (or more) are also convinced that mediation is needed for their complaint to be taken seriously and to lead to an outcome. (See figure 2.5.)

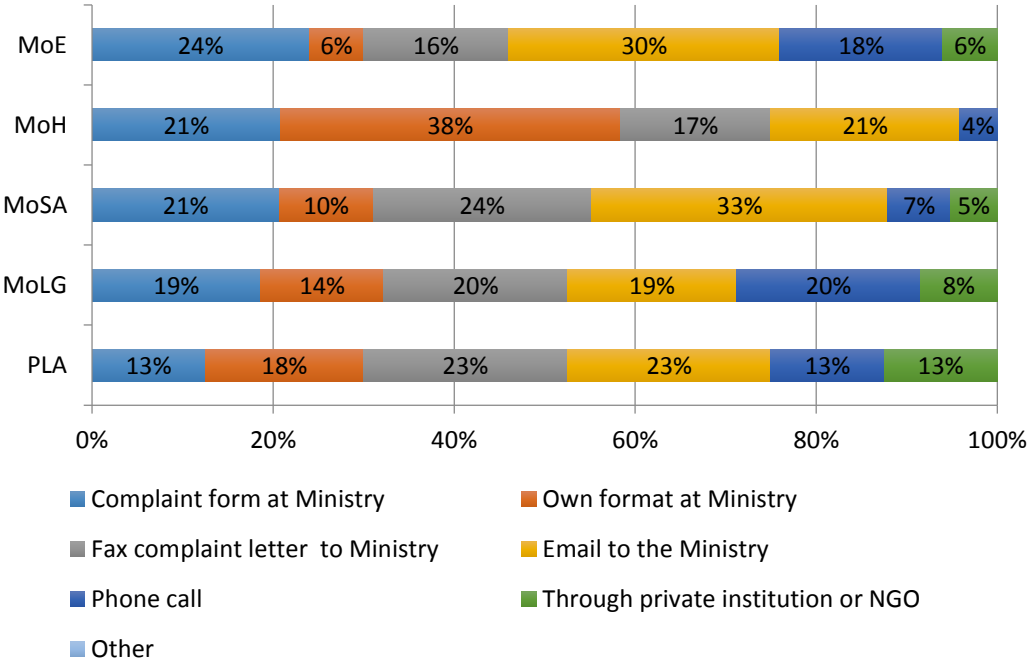
35. **The face-to-face-survey explored in this section was complemented by a phone survey.** While the face-to-face survey was an exit poll, the phone survey interviewed only citizens who had actually submitted complaints to various ministries. The sample size of the phone survey was thus much smaller than that of the face-to-face survey (635 for the phone survey, compared to 1,656 for the face-to-face survey). Several questions in these two surveys overlap and show comparable results: phone survey questions 1, 3, 3.1, 14 and 14.1 mirror questions 1.1, 1.2, 1.2a, 1.6 and 1.6a of the face-to-face survey (see Annex 1 for both survey instruments). Additional findings from the phone survey, which were not covered by the face-to-face survey, are summarized below.[12]

[12] For additional information, please see the "Status, Effectiveness and Efficiency of Palestinian Complaint Units" background report produced by AMAN.

2. How did you file your complaint? (Phone survey West Bank)

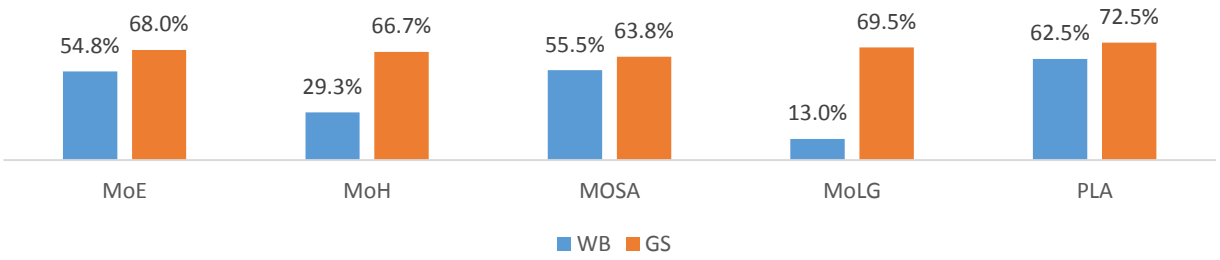


2. How did you file your complaint? (Phone survey Gaza Strip)

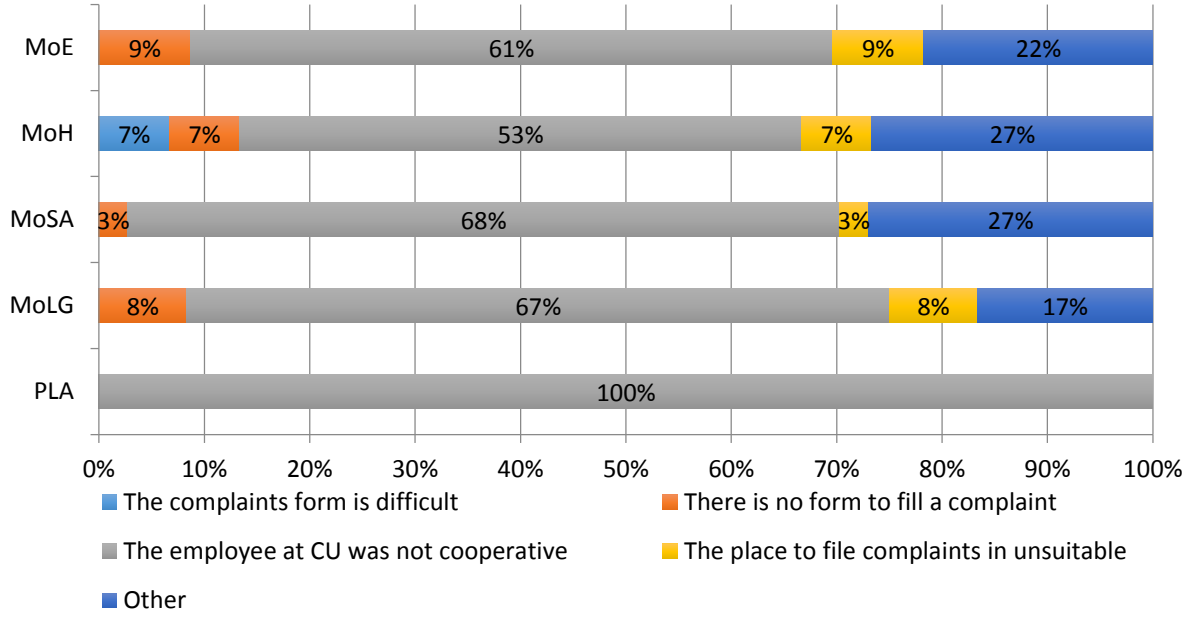


- ***Channels to submit grievances*** **-** In the WB, grievances are mostly submitted either by completing a ministry specified complaint form or writing a personal letter. Almost no respondent submitted grievances by phone. In the GS, fax or email complaints are the most widely used channels. Phone calls are also used to file complaints verbally. (See phone survey graph 2)

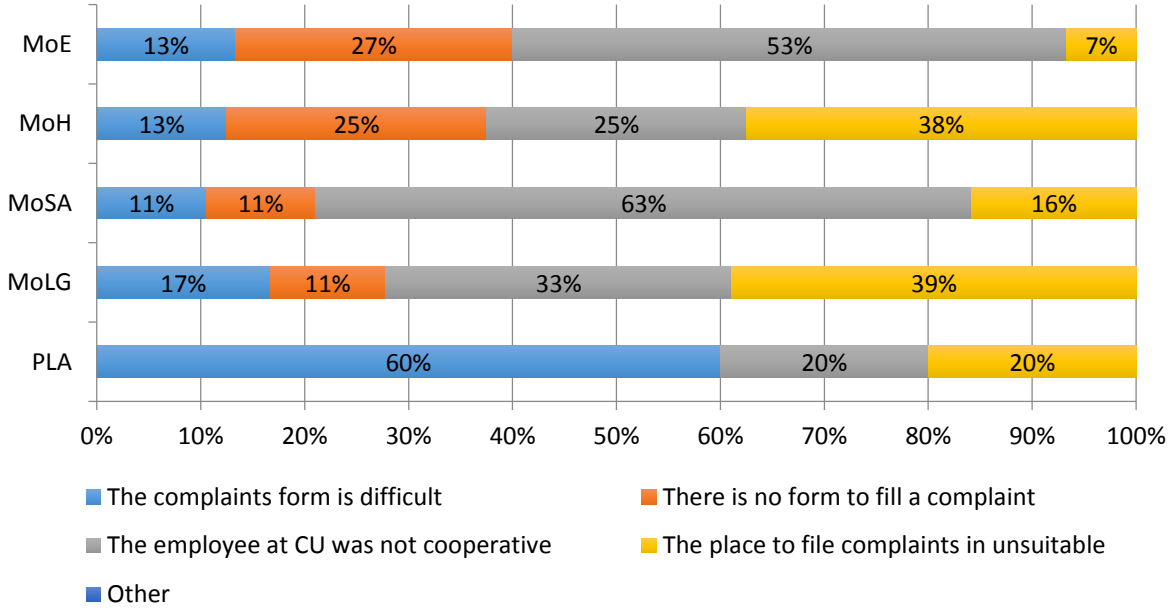
4. Percentage of complainants who "*strongly agree*" or "*agree*" that the CU has clearly informed them about the procedures and follow-up mechanisms to file a complaint (Phone survey)



4.1 Reasons indicated by respondents who did *not* agree that they received information about procedures and follow-up mechanisms to file a complaint (Phone survey West Bank)



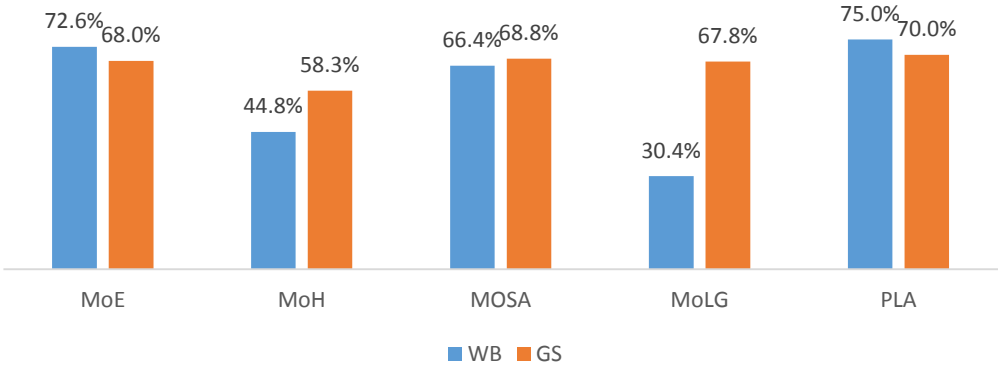
4.1 Reasons indicated by respondents who did *not* agree that they received information about procedures and follow-up mechanisms to file a complaint (Phone survey Gaza Strip)



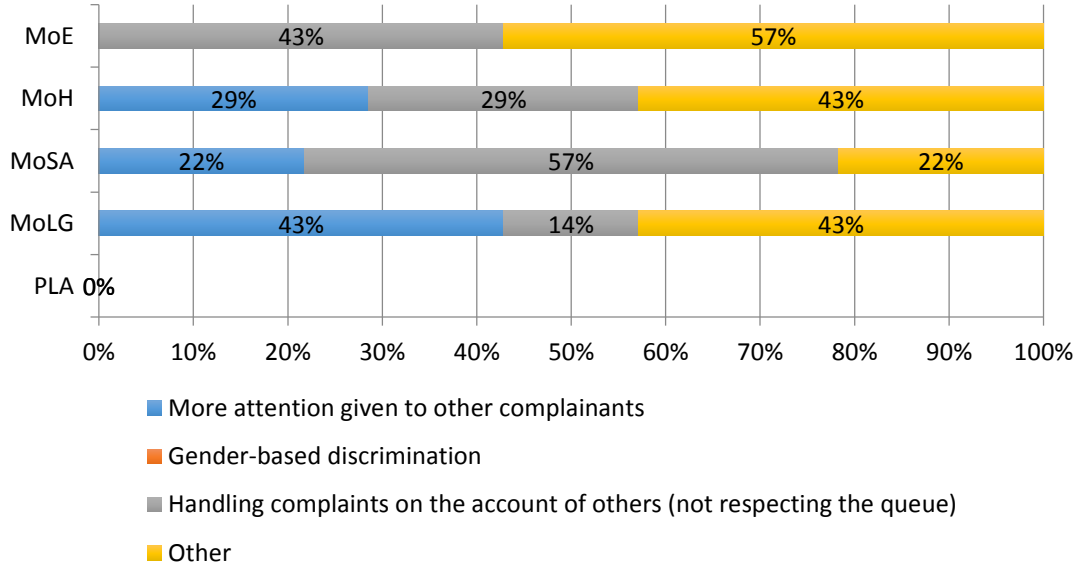
- ***Information provision to complainants about procedures by CU –*** Complainants in the GS tend to agree much more than those in the WB that the CU has informed them clearly about procedures and follow-up mechanisms related to their grievance (See phone survey graph 4). Complainants in both the WB and GS who are unclear about procedures and follow-up mechanisms tend to primarily blame the

lack of cooperative behavior of CU employees. A signification proportion of GS complainants also point out that the physical space where they can file their complaints is not suitable and that the complaint form provided by the ministry is too complex or missing. (See phone survey graph 4.1)

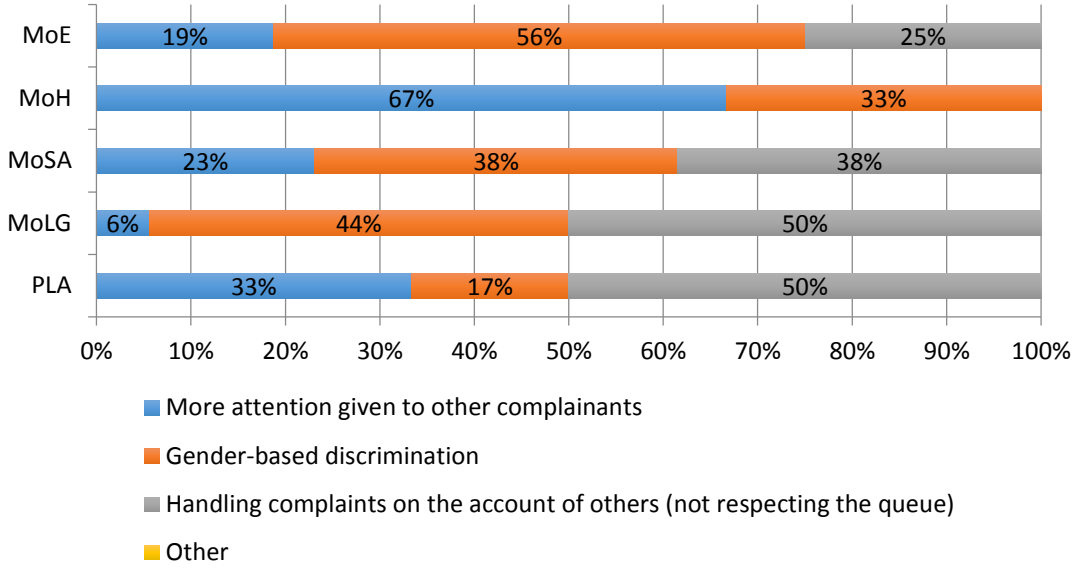
5. Percentage of respondents who "*strongly agree*" or "*agree*" that the CU's team treated them respectfully, neutrally, and without discrimination (Phone survey)



5.1 Reasons indicated by respondents who do *not* think they were treated fairly, neutrally and without discrimination by CU staff. (Phone survey West Bank)

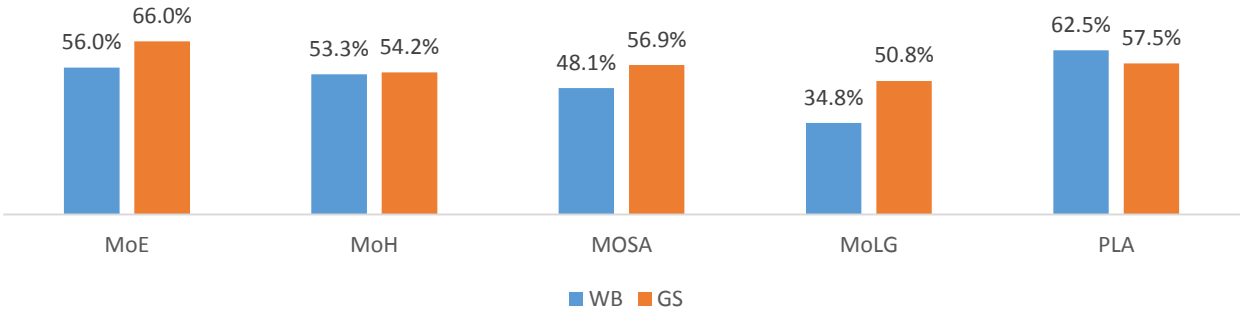


5.1 Reasons indicated by respondents who do *not* think they were treated fairly, neutrally and without discrimination by CU staff. (Phone survey Gaza Strip)

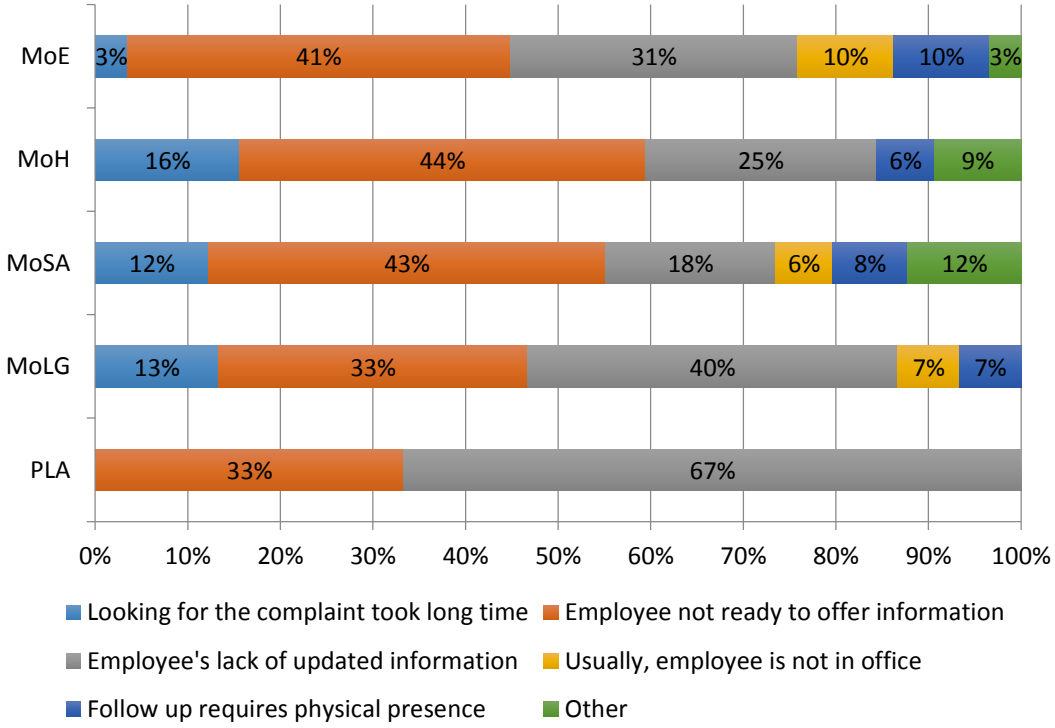


- ***Behavior of CU staff –*** In the WB, the percentage of respondents who "strongly agree" or "agree" that CU staff has been respectful, neutral and non-discriminatory is highest for the PLA (75%) and lowest for the MoLG, where it reaches a mere 30.4% (See phone survey graph 5). In the GS, the highest satisfaction rates with customer service are recorded with the PLA (70%) and lowest with the MoH (58.3%). Gender-based discrimination is not mentioned by WB complainants. In the GS, however, a major part of citizens mention gender-based discrimination to explain their dissatisfaction with CU staff (up to 56% for MoE respondents). Additional reasons include the absence of a "first-come-first-served" rule and more attention given to some complainants. (See phone survey graph 5.1)

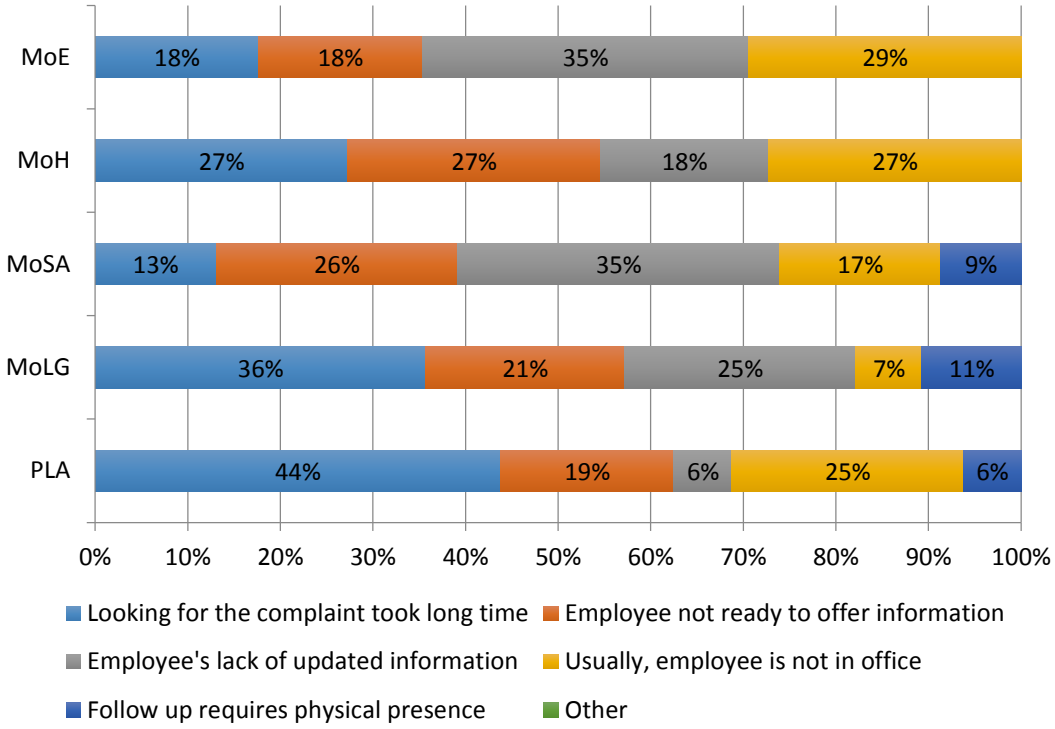
6. Percentage of respondents who "*strongly agree*" or "*agree*" that it was easy to reach complaints unit and inquire about procedures of handling a complaint (Phone survey)



6.1 Reasons indicated by respondents who did not think it was easy to access the CU for follow-up (Phone survey West Bank)

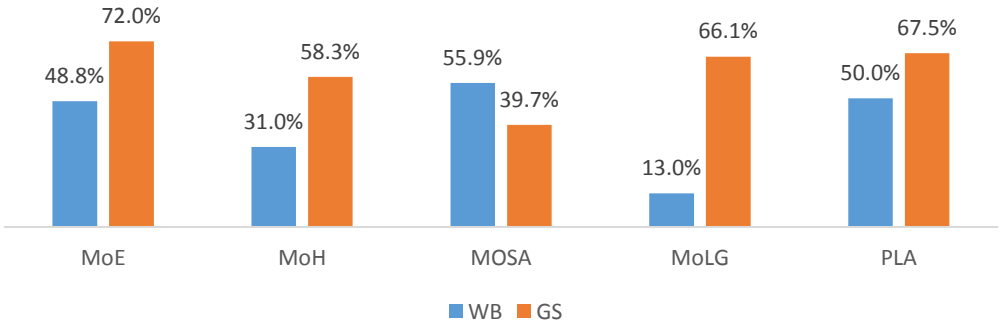


6.1 Reasons indicated by respondents who did not think it was easy to access the CU for follow-up (Phone survey Gaza Strip)



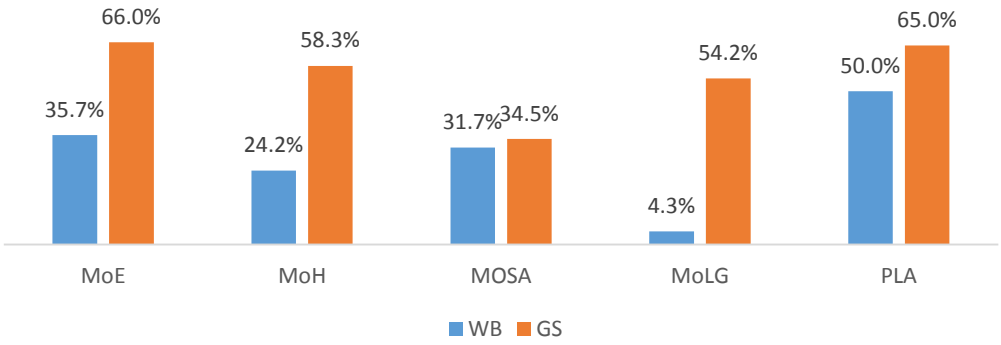
- ***Ease of access to the CU*** - Agreement about ease of access of the CU to inquire about complaint handling procedures is mixed. In the WB, it ranges from 34.8% for the MoLG to 62.5% for the PLA. In the GS, it ranges from 50.8% for the MoLG to 66% for the MoE. (See phone survey graph 6) In the WB, reasons indicated mostly focus on unwillingness of CU employees to offer information or on lack of updated data. In the GS, reasons are mixed and also include the length of time it takes to get access to the complaint file, and staff absenteeism. (See phone survey graph 6.1)

7. Percentage of respondents who "*strongly agree*" or "*agree*" that the CU has provided them with all the information about their inquiry on complaints handling (Phone survey)



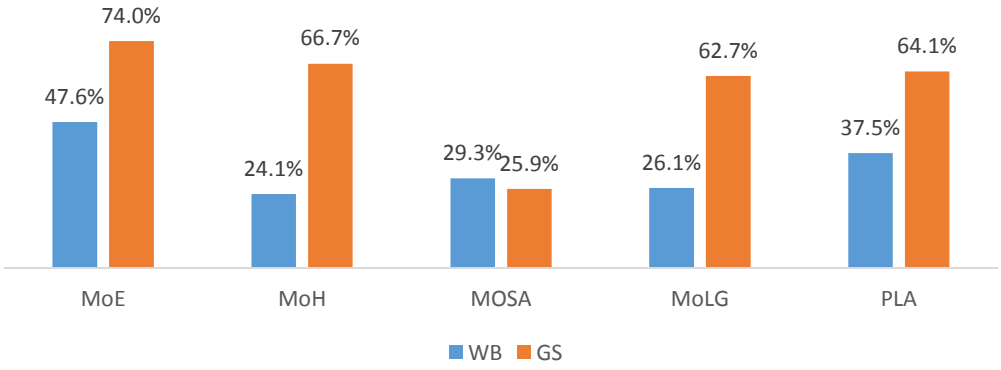
- ***CU provision of status updates to complainants*** **-** In the WB, the highest percentage of complainants who strongly agree or agree that the CU gave them all the information about their inquiry on complaints handling is 55.9% for the MoSA CU. In the GS, the MoE CU scored highest at 72%, and other ministries generally scored fairly high as well. (See phone survey graph 7)

8. Percentage of complainants who "*strongly agree*" or "*agree*" that their complaint was handled in a reasonable time (Phone survey)

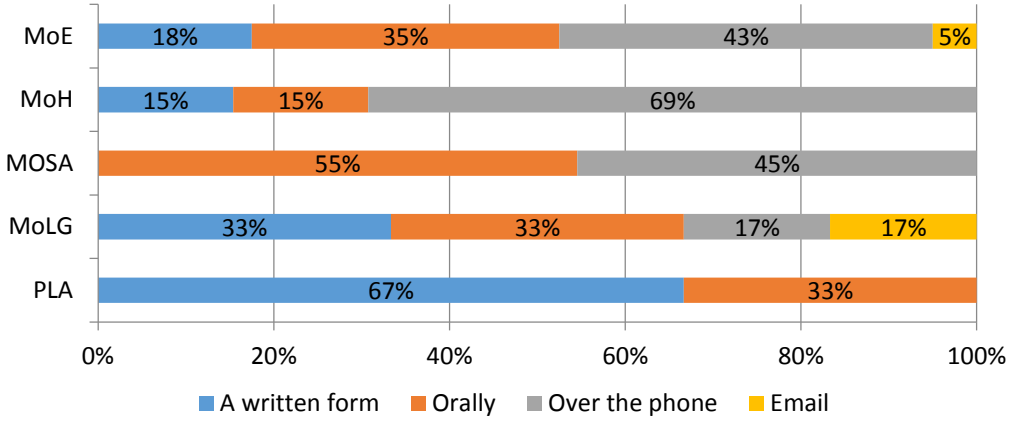


- ***Timeliness of complaint handling*** **-** Satisfaction rates with the timeliness of complaints handling remain fairly low overall, though they are systematically higher in the GS than in the WB. In the WB, the lowest percentage of citizens who strongly agree or agree that their complaint was dealt with in a reasonable time is the MoLG (4.3%) and the highest is the PLA (50%). In the GS, the lowest score is for MoSA (34.5%) and the highest for the MoE (66%). (See phone survey graph 8).

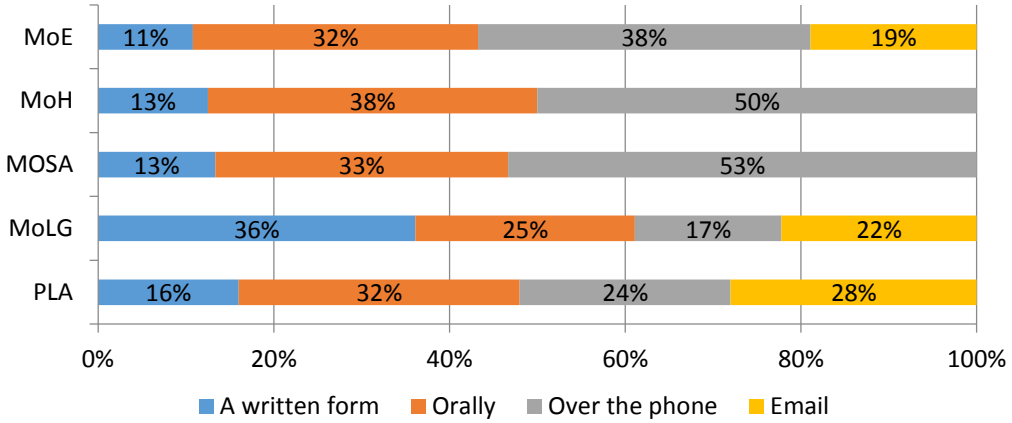
9. Percentage of respondent who agree that the CU employee informed them about the result of their complaint (Phone survey)



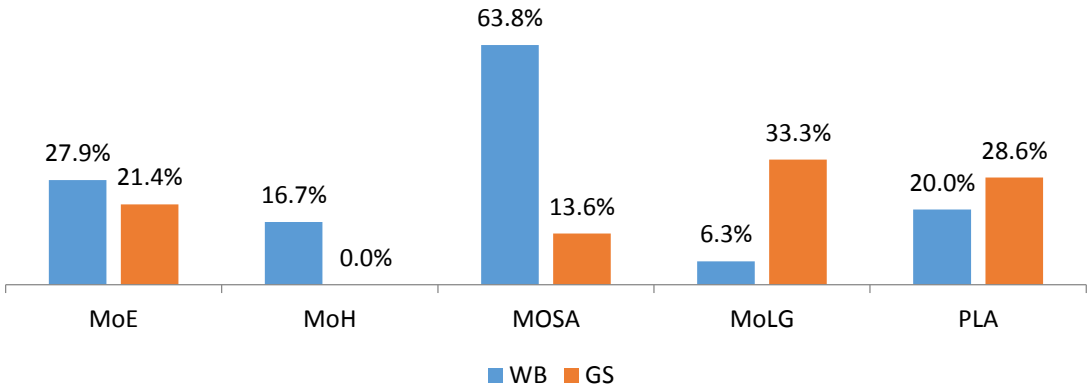
9.1 Channels used by the CU to communicate the result of the complaint to users (Phone survey West Bank)



9.1 Channels used by the CU to communicate the result of the complaint to users (Phone survey Gaza Strip)

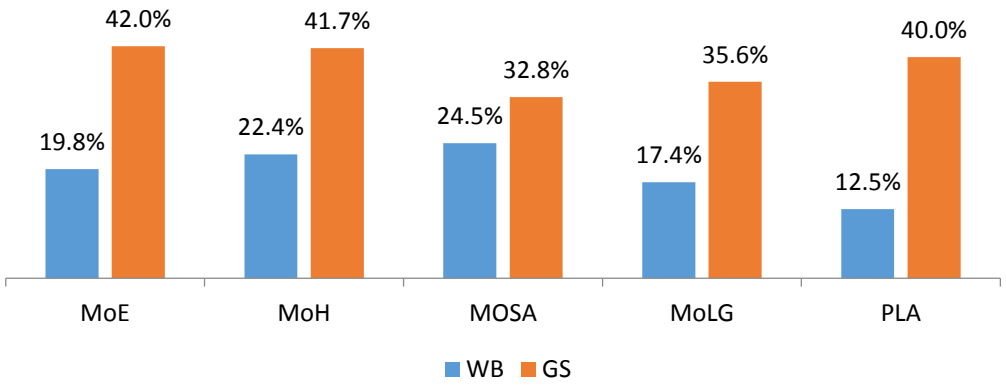


10. Out of the respondents who said they were *not* informed by the CU of the result of their grievance, percentage of those who "*strongly agree*" or "*agree*" that it was easy and fast to retrieve their file during a subsequent visit (Phone survey)

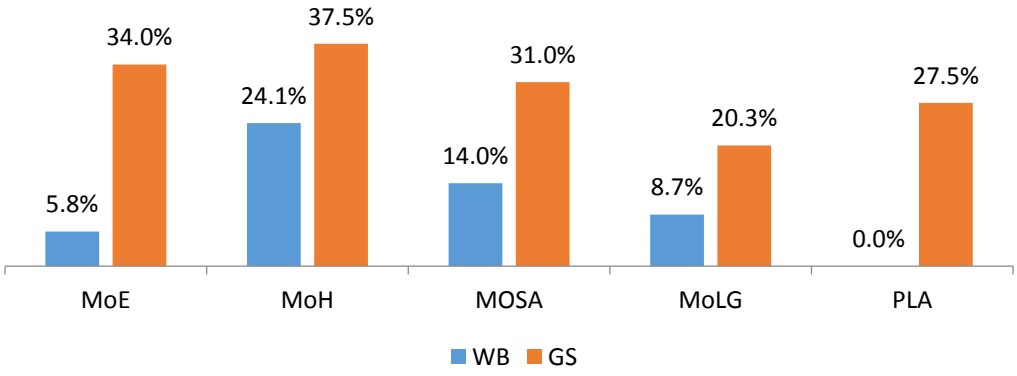


- ***Communication of results*** **-** In the WB, complainants were not systematically informed of the result of their complaint: less than half of respondents said they ever received this information. In the GS, approximately two thirds of complainants (on average) were informed of the results of their undertaking by the CU. (See phone survey graph 9) Information about the results of complaints took place mostly over the phone or verbally, rather than in writing by email or a specific from. (See phone survey graph 9.1) Across the WB and GS, apart from complainants with the WB MoSA CU, less than a third of all respondents who were not informed of the result of their grievance, thought that it was fast and easy to retrieve their file during a subsequent visit. (See phone survey graph 10)

11. Percentage of respondents who asked Ministry employees or officials to follow-up on their complaint (Phone survey)

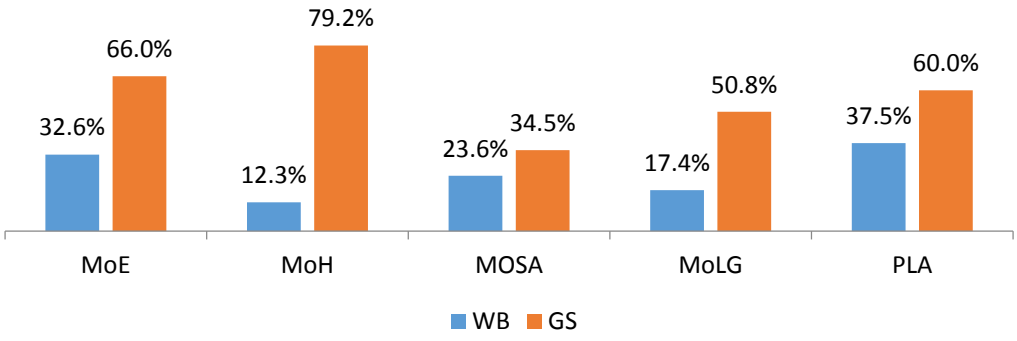


12. Percentage of respondents who sought help from an employee or official outside of the Ministry to follow up on their complaint (Phone survey)

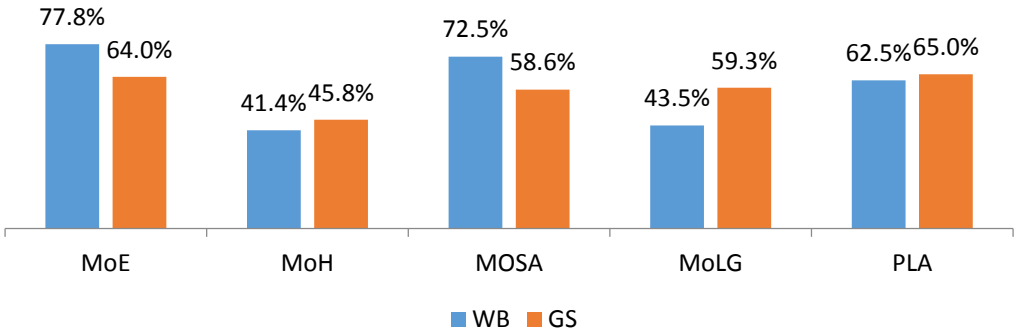


- ***Complainants' search for assistance*** **–** In the WB, one fourth or less of citizens asked ministry employees or external officials to follow-up on their complaint. In the GS, citizens tend to seek help to follow-up on their complaints more frequently: often around one third of them addressed ministry employees/officials, or external employees/officials. (See phone survey graphs 11 and 12)

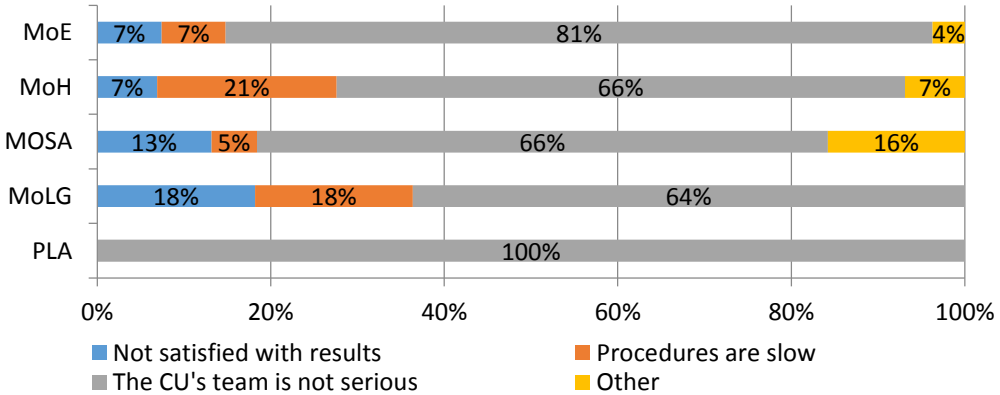
13. Percentage of respondents who "*strongly agree*" or "*agree*" that they are satisfied with the result of their complaint (Phone survey)



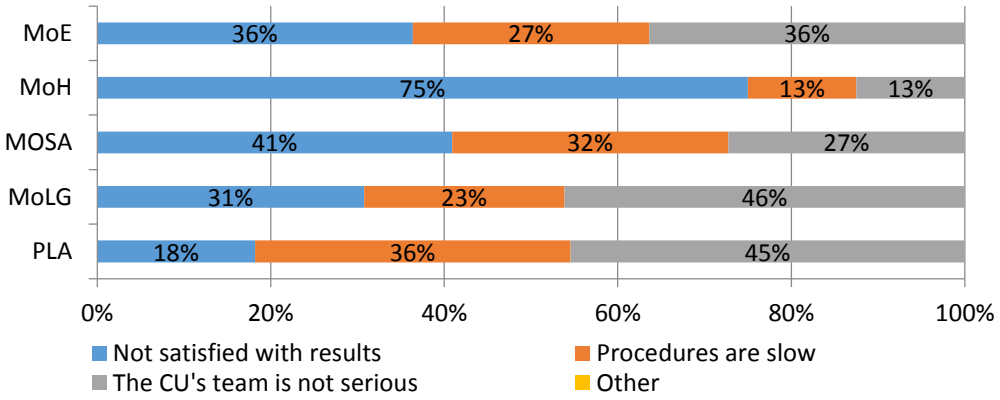
15. Percentage of respondents who agree they will head to the CU if a problem related to the Ministry's service re-occurs. (Phone survey)



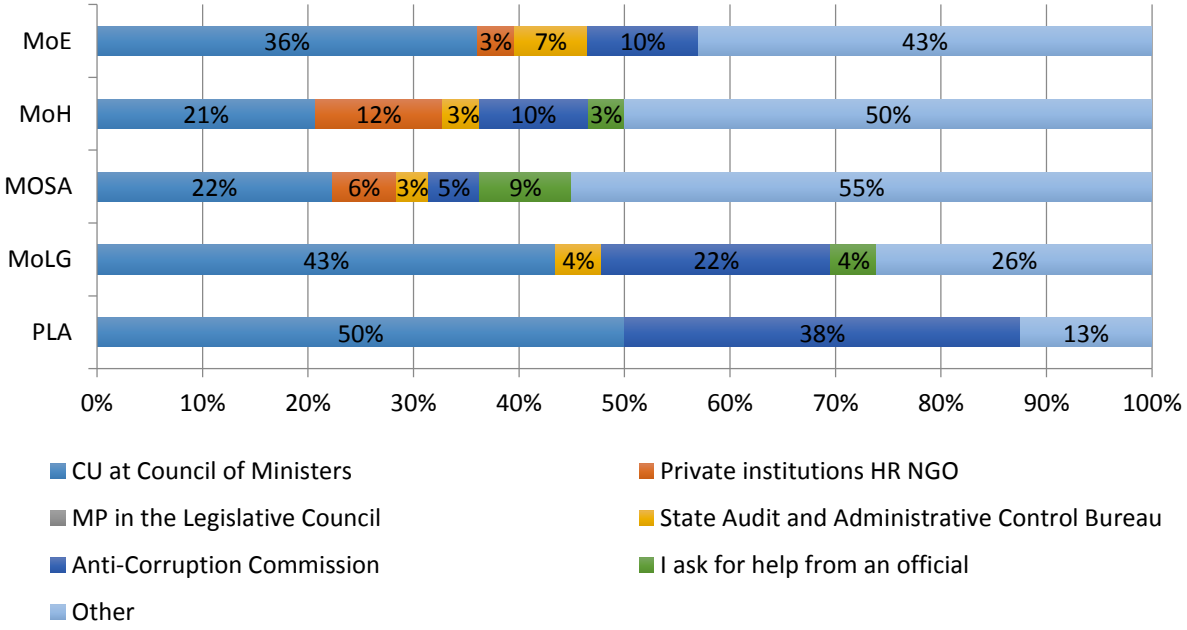
15.1 Reasons indicated by respondents who say they will *not* head to the CU if a problem re-occurs in future. (Phone survey West Bank)



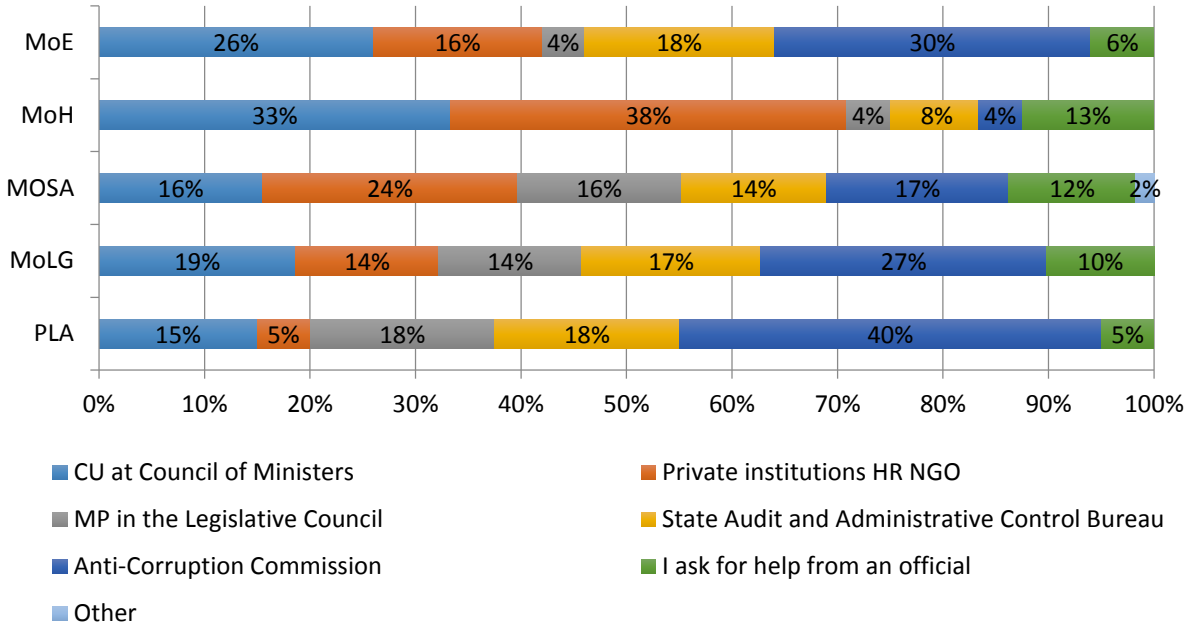
15.1 Reasons indicated by respondents who say they will *not* head to the CU if a problem re-occurs in future. (Phone survey Gaza Strip)



16. 'Go-to' organisations mentioned by respondents who do not envisage filing a complaint with the CU in future when faced with a problem. (Phone survey West Bank)

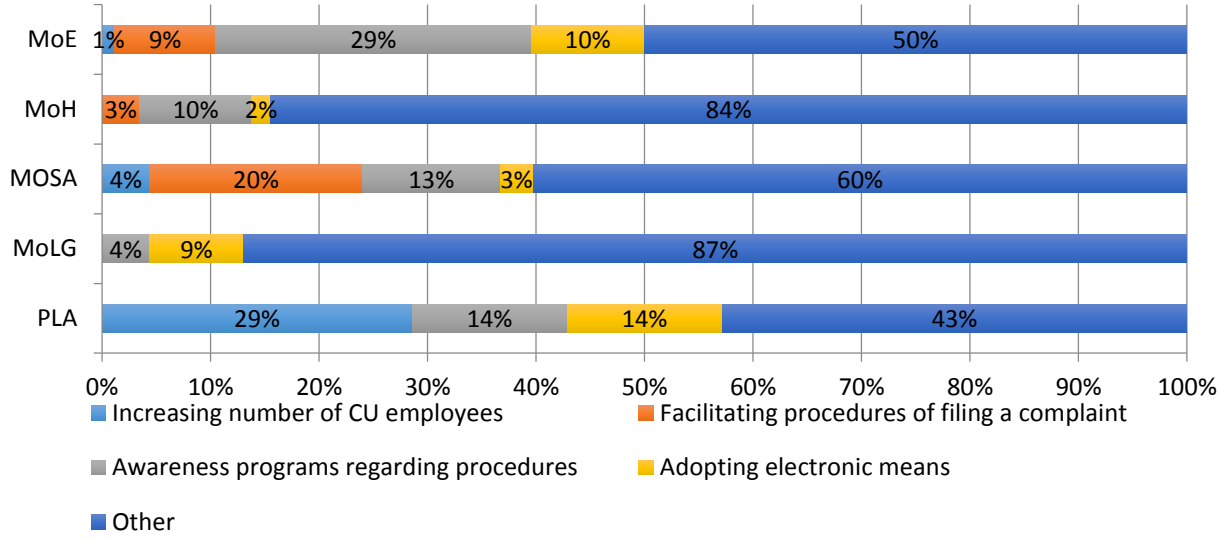


16. 'Go-to' organisations mentioned by respondents who do not envisage filing a complaint with the CU in future when faced with a problem. (Phone survey Gaza Strip)

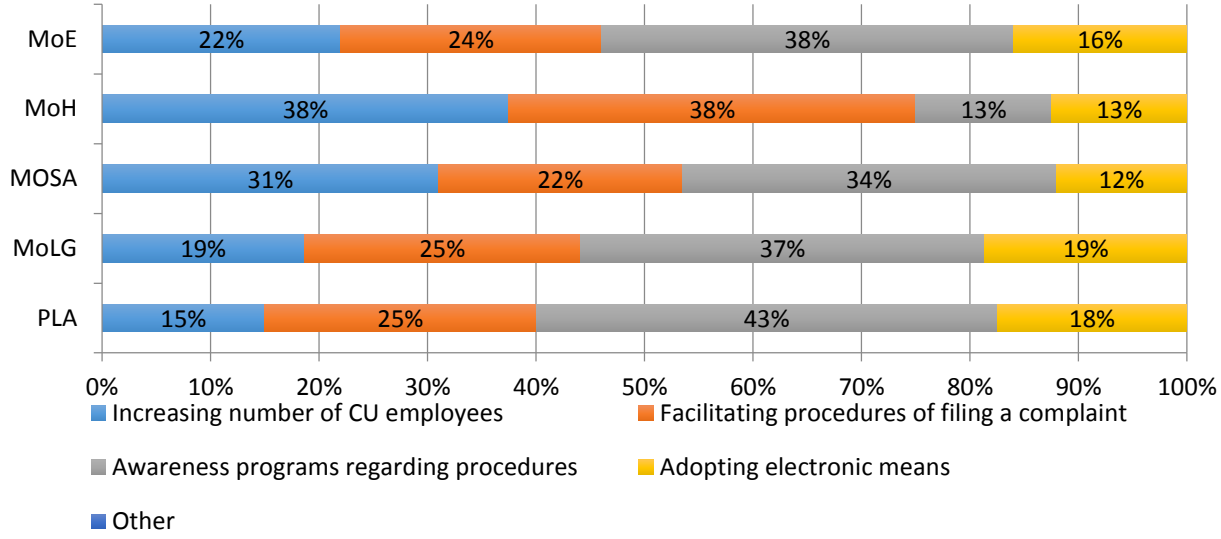


- ***Satisfaction with outcomes*** **-** Satisfaction rates with outcomes are quite low in the WB (the highest satisfaction rate is 37.5% for the PLA, the lowest 12.3% for the MoH). The likelihood that WB complainants will turn to the CU again if a problem re-occurs fluctuates between 41.4% and 77.8%. In the GS, satisfaction rates with complaint results are generally fairly high (between 34.5% for the MoSA and 79.2% for the MoH), and between 45.8% and 65% of complaints agree they might head again to the CU in future if necessary. (See phone survey graphs 13 and 15) Unwillingness to use the CU again in future is mostly linked to a perception of lack of professionality (especially pronounced in the WB) and dissatisfaction with results. (See phone survey graph 15.1 and 16)

17. Respondents recommendations to improve the performance and effectiveness of the CU (Phone survey West Bank)



17. Respondents recommendations to improve the performance and effectiveness of the CU (Phone survey Gaza Strip)



- ***Recommendations for improvement*** **-** In the GS, respondents frequently recommend improving citizen awareness programs regarding complaint procedures (13-43% depending on the ministry), simplifying processes (22-38%), increasing the number of CU employees (15-38%) and mainstreaming digitalized procedures (12-19%). In the WB, priorities for improvement are less clear (over 40% of respondents in each ministry recommend taking "other" measures). (See phone survey graph 17).

36. **Including the citizens' point of view in the analysis of the ministries' CUs is an essential complement to the assessments building on interviews and discussions with government officials.**

However, a number of methodological questions that need further research arose regarding the results of the user survey, including the following:

- What factors account for intra-ministry differences between the West Bank and Gaza?
- How big is the influence of subsample size on the results of particular ministries?
- How should the answer "other" or "don't know" indicated by several respondents be interpreted? Can these responses be drilled down further?
- Can the formulation of some questions have led to overlaps between categories? (e.g. overlap between possible answers, e.g. "employee not ready to offer information" and "employee's lack of updated information")
- If respondents were read out a set of possible options, in terms of possible answers, by the interviewers, this might have created a bias in their responses, despite the possibility to indicate "other".

37. While this section has focused on overall findings, the next section presents a selection of the most significant results disaggregated by Ministry.

Ministry-by-ministry findings

1. Ministry of Social Affairs

A. Communication and awareness-raising

38. **Awareness of MoSA's CU is much lower in the WB** (only 39.4% of face-to-face interviewees knew of it, which is the lowest percentage recorded for awareness of CUs among Ministries in the WB) **than in the GS,** where 68.7% of face-to-face respondents were aware of the CU. **Awareness of the CU also seems to be strongly dependent on respondents' levels of education:** 100% of face-to-face respondents holding a Bachelor's degree, but only 74% with a completed intermediate college education, 55% with completed secondary education, 30% with preparatory education, 24% with elementary education and a mere 13% of illiterate respondents were aware of the CU's existence, suggesting that access to the CHM is not adapted to citizens with lower levels of literacy.

39. **While several awareness-raising initiatives have been taken by MoSA, the Ministry's communication about CHMs can be improved**. MoSA has developed communication materials for an Information, Education and Communication (IEC) campaign, carried out in 2015. This included information for MoSA clients and staff about their rights and the process for submitting and handling complaints. In fact, around two thirds of face-to-face citizens interviewed "strongly agreed" or "agreed" that they had prior knowledge of the procedure to file a complaint, both in the WB and GS. MoSA has developed several ministry-specific brochures and a poster with support from the World Bank in 2015 (see Box 1). The Jenin Directorate, one of the two Regional Directorates to pilot CHM strengthening, created a promotional video which includes information about MoSA programs and the process of submitting complaints. Similar initiatives need to be expanded. When asked about sources of knowledge regarding the CHM, survey respondents rarely indicated the Ministry's website or publications, whether in the WB or the GS (percentages below 5%).

B. Channels for grievance uptake

40. **While in the WB, more than half of complainants submit their complaint letter in person by letter, in the GS, fax and email are used more widely.** More than half (52.8%) of complainants interviewed by phone in the WB indicated that they submitted their complaints in person, at the ministry, by filling out the special form designed for that purpose, and 17.5% submitted their complaints by visiting the ministry and handing in their own complaint letter. The remainder either sent a personal letter by fax (15.3%) or submitted their complaint by e-mail, phone call, or via an NGO/private body. A marked difference can be seen when comparing these figures to those of the GS where 32.8% submitted complaints via email, and 24.1% by a faxed letter.

C. Consistency and quality

41. **Overall, users seem satisfied with the behavior of CU staff.** The phone survey revealed that around two thirds of respondents, both in the WB and GS phone survey, either "strongly agreed" or "agreed" that CU staff behaved in a respectful and non-discriminatory way towards them. Dissatisfaction was mostly related to aspects such as lack of respect for queuing lines or perceptions of unequal provision of information to complainants by CU employees. In the GS, 38% of respondents dissatisfied with customer service pointed out that they felt discriminated against based on their gender.

42. **Communication of progress updates on complaints is frequently unsatisfactory**: 8.7% of phone respondents in the WB survey "strongly agreed" and 47.2% "agreed" that the CU provided them with all the necessary information on the progress of their complaint. However 17% of respondents "disagreed", 7% "strongly disagreed", and 20.1% indicated that they did not know, which reflects complainants' uncertainty as to the amount of information detained by the CU and how much information could or should be communicated to them. Reasons for the dissatisfaction with the communication of status updates seem to be mostly linked to the perception that CU staff was not ready to offer information about the complaint. In addition to highlighting a perception of insufficient transparency, these findings reveal deficiencies in the complaints tracking system, which seems to be characterized by missing status updates that staff could communicate to users upon their inquiry. Therefore, while the ministry has an advanced electronic archive system which documents complaints well, there is room for improving the complaint follow-up system.

43. **Citizens consider timeframes for responding to complaints inadequate, and their satisfaction with outcomes is low.** Only around one third of phone respondents in the WB thought that complaints were being processed within a reasonable timeframe. More than half did not think that the timeframes were appropriate, and 10.5% "did not know". Only one quarter of citizens who filed a complaint stated that they were satisfied with the result of the process. The GS phone survey shows similar results: only 34.5% of complainants thought that the MoSA CU had handled their complaint within a reasonable time, and 34.5% were satisfied with the results of their complaint.

44. **Amongst citizens, there is a widespread lack of belief that using the CU will make a difference or that they will be satisfied with the result.** When asked if they would file a complaint at the ministry if they encountered a problem, only 50.4% users interviewed face-to-face said they would do so in the WB, and 68.7% said they would do it in the GS. 68.9% of dissatisfied complainants in the WB phone survey, and 56.8% in the GS phone survey, indicated that they intended to appeal. The remainder did not choose to submit an appeal, mainly because they did not believe the result would improve (55% in the WB; 36% in the GS), or thought they required mediation for the appeal to be successful (18% in

the WB; 36% in the GS). In the face-to-face survey, 51.6% of respondents intended to submit an appeal if dissatisfied with the results of their complaints in the WB, and 70.8% in the GS.

D. Capacity-building

45. **Significant progress has been made in terms of CU capacity-building**. During 2015-2016, a ministry-specific manual on complaints handling has been prepared with the collaboration of MoSA staff, which provides detailed staff guidance on how to handle complaints. Training materials on complaint handling have been developed and tested successfully, for example, during a three day training in Jericho for MoSA staff from the Jenin and Abu Dees governorates in April 2015. Training of MoSA staff of governorates has greatly increased their understanding of complaints handling, improved communication, and improved their morale. In addition, facilities and equipment in pilot governorates have been improved, e.g. through the purchase of furniture and computers, and the remodeling of offices to create a reception area for visitors including potential complainants in the Ministry Complaints Department and the pilot Directorates of Jenin and Abu Dees.

E. Coordination/cooperation

46. **MoSA is cooperating well with regional directorates.** MoSA has agreed to initiate steps to capture as many complaints as possible in the complaints module of their Management Information System (MIS) and to make the module available to pilot Directorates so that they too can enter complaints directly.

Box 1: Improving Citizen Engagement in the Cash Transfer Program by the Ministry of Social Affairs



In response to a request from the Ministry of Social Affairs (MOSA), the implementing agency for the World Bank supported Cash Transfer Program (CTP), the World Bank conducted a rapid diagnostic of MOSA's existing CHM in May 2014 to identify constraints and areas for improvement an assessment. Based on this diagnostic, MOSA has worked on: (i) improving the design of their CHM; (ii) developing communication and training materials around the CHM; (iii) creating a MOSA specific CHM manual; (iv) delivering a number of capacity building workshops on CHM and CE; and (v) piloting a formal, structured, effective CHM in two pilot Regional Directorates (Jenin and Abu Dees). Two consultants assisted MOSA in developing the CHM operating manual, communications material, training material and building capacity of MOSA staff on CHM procedures. MOSA is planning to launch an IEC campaign in the pilot Governorates in the next few months to inform MOSA clients about their rights and the CHM, how to submit complaints, and the process for handling complaints. MOSA is also upgrading its website to allow citizens to submit complaints online.



In addition, as part of the efforts to engage beneficiaries and other citizens, the CTP has held consultations with beneficiaries, civil society organizations, and other stakeholders; established SMS-based (text messaging) two-way communications with its beneficiaries in order to proactively share project related information and receive feedback; and linked the CHM and project MIS as well as its poverty mapping GIS to identify grievance hotspots. Furthermore, MOSA has been active in communicating with its beneficiaries through a revamped website and social media (e.g., Facebook). More recently, through World Bank support, MOSA has secured 38 tablets for social workers which will facilitate beneficiary outreach.

MOSA plans to expand the CHM pilot from 2 Governorates to all the other Governorates in a phased manner subject to availability of additional funding. MOSA, in collaboration with the Complaints Department at the Cabinet Secretariat, also plans to upgrade its CHM MIS to improve its capacity to capture, track, address, and monitor complaints and beneficiary feedback.

2. Ministry of Education and Higher Education

A. Communication and awareness-raising

47. **While about two thirds of citizens in the WB and GS are aware of the CU, levels of awareness are strongly dependent on respondents' educational background.** In the WB, 62.1% of face-to-face respondents indicated that they knew about the CU. This is the highest percentage captured by the survey regarding awareness levels of CUs in the WB. In the GS, 67.9% of face-to-face respondents were aware of the existence of the MoE CU. In the WB, 75% of respondents with a bachelor degree knew of the existence of the CU, while 100% of those who only completed elementary school said they did not know of the existence of the MoE CU. In the GS, 100% of respondents holding a bachelor degree were aware of the CU. But this was true only for 33% of respondents who completed elementary school or were illiterate. This suggests that access to the CHM is not adapted to citizens with lower levels of literacy.

48. **Prior knowledge of the procedures to file a complaint seems quite widespread**, with 80% of face-to-face survey respondents who "agreed" or "strongly agreed" that they knew about the procedure to submit complaints in the WB, and 82% in the GS.

49. **The MoE has advertised the CU and provided information to potential users**, for example, through posters, brochures, TV spots, or newspaper ads (see Box 2). In the WB, only about one fourth of face-to-face survey respondents said that they had received information about the CU through the Ministry, either by calling it or through the Ministry's website, publications or brochures. Word-of-mouth also seemed to be an important source of information about the CU, since 35% of respondents knew of CU through a friend and 29% via a former complainant. In the GS, just under half of face-to-face respondents knew about the CU through ministry-provided information. Friends and former complainants accounted for 18% and 24% respectively.

50. **The MoE CU's media campaign (including on social media and television), supported by the new Minister who took office in August 2015, has been effective**. The CU has also been working with the Geneva Centre for the Democratic Control of Armed Forces (DCAF) on workshops and brochures aimed at diversifying the materials that can increase citizen awareness of the CU and of procedures to submit complaints. These factors may explain the recent spike in the number of complaints, which increased from 314 in 2014 to 1,660 in 2015. This is reflected by the survey results regarding knowledge of the procedure to submit complaints. Indeed, two thirds of WB respondents indicated that their knowledge originated from the ministry (33.3% via a ministry employee, 20.1% via ministry website/publications and 13.3% via a phone call to the ministry). As for GS respondents, 57.1% said that their knowledge came from the ministry (28.6% via a ministry employee, 14.3% via a phone call to the ministry and 14.2% via ministry website/publications).[13] The remainder were informed by former complainants.

51. **Complaints have been used to drive visible change in terms of policy and procedures in the MoE**, on topics such as teacher transfers, unfair dismissals, school oversight and supervision practices, including instituting a transparent system for the provision of periodical staff appraisal and performance feedback (See Box 2).

[13] AMAN report p. 63-64

Box 2: Recent Interventions by the Ministry of Education to Improve Complaint Resolution

The Ministry of Education and Higher Education (MoE) has recently undertaken a number of steps to listen to citizens, collect their feedback and improve complaint resolution. The MoE's Complaints Unit, empowered by the new Minister who took office in August 2015, has:

- Increased staff in the Complaints Unit;
- Adopted the Complaint Management System being piloted by the Directorate General of Complaints (DGC) which allows submission of complaints through the web;
- Initiated a campaign to increase awareness about the complaints handling mechanism through social and electronic media;
- Started accepting complaints through emails and social media;
- Initiated using complaints analysis to improve policy and procedures.

As a result of these measures, the Complaints Unit received 1,160 complaints in 2015 as compared to 314 complaints in 2014. Of these 1,660 complaints, about 100 were submitted through the newly rolled-out CMS. During the period September-November 2015, 55 percent of the complaints were submitted through email, 20 percent through the CMS and 2 percent though face-to-face meetings at the MoE and postal mail. The sharp increase in number of complaints has been attributed to the Minister's support, the awareness campaign led by the Minister, and the addition of email and the CMS as complaint uptake channels which make it easier to submit complaints. Some complaints have led to procedural changes in the Ministry. For example, a series of complaints from teachers regarding their transfers have led to a directive regarding teacher transfers. Similarly, complaints submitted by a number of teachers about their dismissals from their posts were investigated and led to the reinstatement of 13 of 18 teachers who were unjustly sacked; this in turn has led to further enhancements in school oversight and supervision practices including instituting a transparent system for the provision of periodical staff appraisal and performance feedback. The Complaints Unit has drafted an action plan to further improve complaints handling practices.

52. **Despite these efforts, when asked about possible ways to improve the CU, 29% of WB and 38% of GS phone survey respondents still suggest "increasing awareness raising programs".**

B. Channels for grievance uptake

53. **The majority of WB complainants submitted their complaints in person, by writing a letter or filling out the MoE's grievance form.** Results of the telephone interviews in the WB revealed that 32% of complainants submitted their grievance through a personal visit during which they filled out the Ministry's specific form for complaints, and 29% filed their complaint through a visit to the ministry but submitted a complaint letter they wrote themselves. Complaints submitted by emails and fax accounted for 13% each, while 13% of respondents submitted their complaint through other means including the phone, an NGO, a third person, or municipalities and local councils. In the GS, 24% of complainants used the special form available at the ministry, 30% submitted complaints via email and submission via fax or phone amounted to 16% and 18% respectively. Participants in a meeting with parent councils highlighted that the phone availability of the ministry was not always optimal: lines were said to often be "busy", and a desire for a toll free phone number was expressed.

54. **However, this is starting to change due to the rollout of the Complaints Management System (CMS), which allows submission of complaints through the web**. MoE complaints are now accepted through emails and social media. During the period September-November 2015, 55% of complaints were

submitted through email, 20% through the CMS and 2% though face-to-face meetings at the MoE and postal mails. The addition of email and the CMS as complaint uptake channels has thus made an important contribution and facilitated the expression of grievances.

55. **There is a fairly high willingness on the part of citizens to submit complaints to the CU if necessary, which is good**. Results showed that 67.8% of MoE visitors in the WB agreed that they would indeed submit a complaint if faced with a problem, which indicates a fairly well-established level of trust in the ministry's CU. Results of the phone interviews showed that only 14.3% of complainants submitted complaints to parties other than the MoE in the WB. When they did, half of them said that it was mainly to avoid bureaucracy. In the GS, 80% of visitors said that they would be willing to file a complaint with the CU. 40.8% of those interviewed by phone in the GS said that they submitted complaints to parties other than the MoE CU. The most important reason expressed by half of them was that they were not aware of the existence of the CU.

C. Consistency and quality

56. **Survey results point towards good customer service.** Nearly three quarters (72.6%) of those interviewed by phone, who had interacted with the WB MoE CU, agreed that the unit's staff interactions with users was respectful, neutral and non-discriminatory. In the GS, the percentage of agreement was of 68%, a little less than in the WB. In the GS, more than half of the respondents who were dissatisfied with the CU staff's behavior indicated that they believed they were discriminated against based on their gender (56%).

57. **While the MoE's CHM appears to be working well (it is registering all received complaints and resolving most of them), more progress can be made on providing information on the status of the complaint procedures**. The CU has a computerized system for tracking complaints using MS Excel since 2007 and strives to communicate with complainants on a regular basis to keep them updated on the status of their complaint: 56% of phone respondents in the WB and 66% of phone respondents in the GS said that they either "agreed" or "strongly agreed" that accessing the CU to enquire about the status of their complaint was easy. More than half of respondents who reported that they did not find it easy to follow up on their complaints indicated that this was due to the lack of information provided by ministry employees or unwillingness of CU staff to communicate updates (this is valid for both the WB and the GS). A significant 29% of GS respondents also pointed out that employees are sometimes not present in the office.

58. **Respondents felt that timeframes should be shortened, and communication with users about results systematized.** Regarding the time period in which the complaint is addressed, only 35.7% of respondents in the WB felt that the time period mentioned was reasonable, and less than half (47.6%) deemed that they had been informed of the result of their complaint. In contrast, 66% of complainants in the GS agreed that MoE CU addressed complaints in a reasonable time, and 74% of them that they were informed of the results of their complaints.

59. Similarly, **satisfaction with results turned out to be fairly low in the WB**. Only approximately one third (32.6%) of respondents in the WB said they were satisfied with the results of their complaint. **In the GS, by contrast, two thirds (66%) of complainants expressed satisfaction with the results of their complaints** (12% "very satisfied", 54% "satisfied"). Although the CU has surveyed a random sample of 50

complainants to evaluate users' satisfaction levels, there is no institutionalized feedback mechanism for complainants regarding their experience with the CHM.

D. Capacity-building

60. **The MoE CU has relatively few staff, although it receives more complaints than any other ministry.** It used to have only one person, but this increased since August 2015 and the appointment of the new minister. This makes the CU very dependent on the resolution of complaints at lower levels (e.g. in schools) and creates the risk of a backlog. As a consequence of the shortage of staff, the MoE CU is not always in a position to conduct on the ground investigations or monitoring to ensure that complaints have been satisfactorily resolved.

61. **Shortage of staff has, to date, limited the CU's ability to use available data to guide decision-making.** The CU MIS is used to help analyze trends in MoE performance and problem areas, but the CU is too busy to do statistical analysis of the complaints beyond what they do in their reports to the DGC.

E. Cooperation, coordination

62. **Cooperation across administrative levels and departments seems to be one of the strengths of the MoE.** The CU appears to cooperate well both with the DGC and with other MoE departments. MoE CU staff has been involved in the development of DGC's Complaints Management System. About 95% of CU recommendations to the Minister of Education are approved. In addition, the ability of school staff or administrators to resolve many complaints means that a good number of them never reach the MoE CHM.

63. **At the same time, in the absence of dedicated complaints focal points at lower levels, the MoE CU's heavy reliance on the Internal Control Units in Regional Directorates is challenging**, since these do not have the same autonomy nor specialized focus as staff in the CU (e.g. they do not have the authority to conduct on-site investigations on their own). Despite this being a long-standing demand by the CU, there are still no dedicated focal points in regional directorates to handle complaints. Many complaints received by the directorates are not passed to the CU.

3. Ministry of Local Government

A. Communication and awareness-raising

64. **There is a fairly high awareness of the MoLG CU across the Palestinian territories, but the CU's online presence can be strengthened**: 55% of face-to-face survey respondents in WB, and 70.2% in the GS are aware of the CU's existence. Knowledge about the CU originates from a variety of sources (contacting the ministry, former complainant, finding out independently through the grievance boxes, etc.). Overall though, it seems that the opportunity provided by the website or ministry publications is underutilized: only 9% of respondents in the WB phone survey, 6% in the WB face-to-face survey, 15% in the GS phone survey and 6% in the GS face-to-face survey indicate the ministry website or ministry publications as a source of information.

65. **User awareness of the procedures to submit complaints is widespread**: 82% of respondents in the WB face-to-face survey either "agreed" or "strongly agreed" that they knew these procedures; in the GS this figure was at 83%. The MoLG appears to be a solid source of information on this for WB face-to-face respondents: 29.6% said they received the information through a phone call to the ministry, 25.9% through a ministry employee, and 14.8% via ministry website and publication, 22.2% via a former complainant, and 7.5% through other means. In GS, a phone call to ministry provided the required information for 43.8% of face-to-face respondents, a ministry employee and the website to 18.7% respectively; and former complainants to 18.8% of people interviewed.[14]

66. **These results reflect the efforts made by the CU to produce various materials to increase citizen awareness of the CU and of the process to submit complaints**. Indeed, the MoLG CU conducted a student-led outreach campaign in 2012, which included the dissemination of printed materials to families (e.g. brochures, posters), which explained the objective of the CU, where and how to submit complaints, as well as the appeal process. However, this campaign lapsed with the end of Belgian Technical Cooperation (BTC) financial support.

B. Channels for grievance uptake

67. **While most WB complainants submit their grievance in person by a letter to the ministry, GS complainants favor phone, fax and email to communicate their complaints to the CU**: 61% of respondents in the WB phone survey had submitted complaints by bringing a personal complaint letter to the ministry, 13% by submitting a complaint letter by fax, 9% by filling the dedicated ministry form out in person, and 4% by email. The GS phone survey shows quite different results, with 20% of respondents submitting their complaint by phone, 20% by letter through fax, 19% by email, 19% by filling out the ministry form, 14% delivering a personal complaint letter to the ministry, and 8% channeling their complaint through an NGO/private body.

68. **There seems to be a fairly high willingness of citizens to submit complaints to the CU:** 73.9% of visitors to the MoLG in the WB and 79.6% in the GS face-to-face survey agreed that they would submit a complaint if faced with a problem, which reflects a fairly high level of trust and confidence in the ministry and the CU. In the WB, 42% of the respondents who said they would not file a complaint to the CU indicated "highly bureaucratic procedures" as a reason. In the GS, 28% indicated the conviction that nepotism and favoritism would decide upon the resolution of a complaint as a reason why not to file a complaint.

69. **A significant proportion of citizens who address their complaints to entities other than the CU do so to receive legal advice and additional support.** Results of the telephone interviews in the WB

[14] AMAN report p.93-94

revealed that 26.1% of complainants filed their grievances through parties other than the MoLG CU (e.g. NGOs and anti-corruption commission). Reasons for that, according to 50% of them, was the search for support, backing, and legal advice, while the other 50% said it was due to lack of knowledge of the CU (17%), willingness to avoid bureaucratic procedures (17%), lack of confidence and trust in the performance and professionalism of government (17%). As for the face-to-face survey in the WB, it shows similar results: 30.3% of respondents submitted complaints to parties other than the MoLG CU. The primary reason underlying their decision is the need to receive legal support and advice (44%), while a second reason is the hope to avoid bureaucratic procedures (33%), and a third reason is lack of knowledge about the CU (11%). The most important point is the need for legal advice which was in the forefront of reasons why to resort to outside parties. This can be linked to the services provided by the ministry, municipalities and local councils, which concentrate on issues of construction and building permits. In the GS, 39% of respondents in the phone survey, and 50% of respondents of the face-to-face survey said that they submitted complaints to parties other than the MoLG, the reason being their lack of knowledge of the CU at the ministry (18% phone survey; 44% face-to-face survey), bureaucratic procedures (32% phone survey; 33% face-to-face survey) and support and technical advice (27% phone survey; 22% face-to-face survey).

C. Consistency and quality

70. **Further progress can be made in terms of staff behavior towards complainants, especially in the WB.** Indeed, survey results have shown that only approximately one third of WB phone survey respondents agreed (but nobody "strongly agreed") that the MoLG CU staff behavior was respectful and non-discriminatory, one third disagreed or strongly disagreed, but one third also did not meet any CU staff in the process. In the GS, 67.8% of respondents "agreed" or "strongly agreed" that the staff treatment of complainants was respectful, neutral and non-discriminatory (and all respondents met with a CU employee). The main reason for dissatisfaction indicated by respondents in the WB phone survey was a perception of unfairness in the treatment (43% said they felt that some complainants benefited from preferential treatment). This is similar to the GS where 50% of respondents indicated that their negative assessment of staff behavior was linked to the perception of nepotism or favoritism (*wasta*) instead of an equal "first-come first-served" principle; 44% of them said that their perception of negative treatment by staff was due to gender bias.

71. **Although the MoLG CU has a database to track complaints, there is room for improvement in terms of communicating status updates to complainants about their grievance.** The MoLG CU issues receipts for complaints received and has developed a MIS that allows for complaint analysis. Despite that, the WB phone survey reveals that only 34.8% of complainants agreed that accessing the CU to follow-up on their complaint was easy, while around two thirds "disagreed" or "strongly disagreed". A very high percentage of respondents express strong views: 56% of them "strongly disagree" that access is easy. The main reason for dissatisfaction with the process is lack of updated information (40%) and lack of readiness of the CU's employee to provide information regarding the complaints (33%). In the GS, approximately half of the phone respondents found it easy to get information on the status of their complaint, and half did not. In the GS, in addition to the two factors of dissatisfaction named above, an additional one was the length of the process to retrieve the complainant's file, mentioned by 36% of respondents. In the WB phone survey, a very significant percentage of respondents (60.9%) "strongly disagreed" and 26.1% "disagreed" that the CU provided them with information about the complaint's progress. Only 13% "agreed" they had received the required information on complaint progress. In this regard, the GS phone survey shows fairly different results: in the GS, a total of 66% of complainants "strongly agreed" or "agreed" that the CU provided them with required information on progress, while 34% "disagreed" or "strongly disagreed".

72. **WB complainants were much less satisfied than complainants in the GS about being informed of the results of their complaint**: in the WB, only 26.1% of complainants said they were informed of the results of the whole process, and only 4.3% felt that the complaint handling had been processed within a reasonable time. In contrast, for the GS, 62.7% of phone respondents said they were informed of the results of their complaint and 54.2% were satisfied with the time it took.

73. **Complainants in the GS were much more satisfied with outcomes of their complaints than those in the WB**. The WB phone survey showed that only 17.4% of respondents were satisfied with the outcome of their complaint, while in the GS, the percentage of satisfied citizens was almost three times as high (51% of complainants expressed their satisfactions with the results of their complaints; 17% were "very satisfied" and 34% "satisfied").

D. Coordination, cooperation

74. **Cooperation and communication between CU staff and other departments in investigating complaints seems to be good, and CU staff has also been cooperating with the DGC**, for example by providing inputs to improve the CMS.

75. **There are currently no complaints officers below the ministry level**. Existing focal points on complaint handling in regional offices do not have clearly defined responsibilities or reporting requirements: while they do contribute to complaint handling, their roles are not formalized.

76. **At the local government level, it appears that municipalities with Citizen Service Centers often have well-functioning CHMs**, (see Box 3) which creates opportunities for potential synergies.

Box 3: Complaint Resolution through One-Stop Shops in Ramallah Municipality

The Ramallah Municipality was one of four municipal governments in Palestine to establish a one-stop shop (OSS) in 2006. The OSS handles about 100 government services, the most frequently used of which are paying municipal fees, and obtaining permits and licenses. All tracking and reporting on service requests and transactions is computerized. Citizens filing a service request can check on the status of their request online through computer kiosks in the RM office. Soon this will be web-enabled allowing citizens to check the status of their requests from home. The RMG OSS also conducts customer satisfaction surveys, with three having been completed to date.

The Municipality (RM) established a complaints handling unit (CHU) in May 2014 to replace its informal system with a formal, effective CHM. Though the CHU is small, with only two full-time staff, other departments assist them in investigating and responding to complaints (e.g. the engineering department deals with complaints relate to property borders, encroachments, building code violations, etc.). The CHU has developed a computerized system to track complaints. Advertisements in newspapers and magazines, billboards, and brochures in public places such as the One Stop Shop (OSS) have advertised the CHU's presence and the rights of citizens to submit complaints

The CHU receives about 500-600 complaints a year via phone, a standardized form and/or or a written application. These are entered into a computerized database (a CHM MIS) which has 15 customized templates for recording different types of complaints. The CHU sends the complaint to the relevant government unit depending on the nature of the complaint. They can flag it as urgent. The responsible unit for investigating and resolving the complaint has 2-3 days to respond to the CHU, indicating how long the redressal action is expected to take. If no response is received, the CHU sends a reminder. If they still do not receive a response, the mayor is alerted. If the complaint is submitted to the OSS, the complainant gets a receipt.

The CHU produces monthly reports with separate sections on formal and informal complaints. It compiles statistics including the status of complaints and their resolution. The CHU plans to link the CHM MIS to a GIS to improve analysis. The CHU also conducts random spot checks 2-3 times a month to see if complaints are being resolved satisfactorily.

4. Palestinian Land Authority

A. Communication and awareness-raising

77. **Awareness of the CU and of procedures to submit complaints to the PLA is lower** in the WB than in the GS. While in the WB, overall awareness of the PLA CU is low (41.5% of WB face-to-face respondents did know of the CU), in the GS, many more respondents were aware of its existence (64.9%). Similarly, not all WB citizens are well-informed of the CU's complaint handling processes: in fact, less than half of the face-to-face respondents in the WB survey "agreed" that they knew the procedure of submitting complaints (44%). In the GS, the percentage of citizens aware of these processes increases to 88%.

78. **The PLA provided information about the existence of the CU to less than half of the survey respondents; other sources of information (e.g. NGO, former complainant, friend) dominated.** For example, in the WB, only 13% of phone respondents knew of the CU through the ministry. In the GS, 41% of phone respondents knew about the CU via the ministry (either by contacting it or via website/publications). However, it is important to note that the phone surveys for the PLA had very small samples: 8 respondents for the WB phone survey and 40 for the GS phone survey. Face-to-face survey results show that across the Palestinian Territories, less than half of citizens know of the CU via contact with the Ministry or its website and publications.

79. **Both for the GS and the WB, more than half of face-to-face respondents indicate that the information about procedures to submit a complaint originated from the PLA**, whether by a phone call, a PLA employee, or the PLA's website or publications. The main other source of information was former complainants (40% in the WB, 37.5% in the GS).[15]

B. Channels for grievance uptake

80. **While WB complainants have resorted to in-person visits and letter-writing to the ministry to submit their complaints, GS complainants tend to use email and fax.** Results of the WB telephone survey regarding access channels revealed that half of the respondents submitted their grievance through a visit to the PLA with a letter written by them, while the other half visited the ministry and filled out the official complaint form. As for the GS, results showed that 23% of respondents submitted their complaints by email, and 23% by fax; thus almost half did not submit their complaint in person. 18% submitted their own letter through a visit to the PLA, 13% submitted their grievance through an NGO or private institution, and 13% by telephone.

81. **Willingness to file complaints with the PLA in the GS is much higher than in the WB:** 60.4% of respondents in the WB face-to-face survey agreed they would file complaints if faced with a problem with the PLA. As for the GS, 79.4% of face-to-face respondents said that they would file a complaint if necessary. In the WB, the main reasons indicated by respondents who would not envisage filing a complaint to the PLA were the highly bureaucratic procedures (37%), followed by the conviction that personal relations are necessary to reach a favorable outcome (25%), and overall lack of confidence in government performance (21%). In the GS, essential reasons were previous experiences of friends/acquaintances (23%), as well as overall lack of confidence in government performance (21%), conviction that personal connections are needed (20%), that filing a complaint with an NGO would be more effective (20%) and that procedures are too bureaucratic (18%).

82. **It seems that many citizens do not trust the PLA's CHM and therefore do not approach PLA settlement offices for assistance or with their grievances**, despite the huge numbers of citizens using

[15] AMAN report p.115-116

PLA services and the fact that valuation procedures have led to hundreds of complaints. This is suggested by the comparatively low number of grievances received by the CU (17 in 2013; 20 in 2014).

83. **Citizens turn to third parties for help:** 29.4% of WB face-to-face survey respondents and 22.2% of GS face-to-face survey respondents did submit complaints to parties other than the PLA CU. In the WB, half of respondents did so because they did not know of the CU, and half to avoid bureaucracy. In the GS, 60% of respondents who submitted complaints to parties other than the PLA's CU did so because they were not aware of the existence of the unit, while 40% did so to save time and effort as they perceived submitting a grievance to the PLA CU as a heavy bureaucratic process.

C. Consistency and quality

84. **Generally, citizens seem satisfied with CU staff behavior:** 75% of respondents interviewed by phone in the WB strongly agreed or agreed that the CU employee's treatment had been respectful, neutral and non-discriminatory. In the GS, 70% strongly agreed or agreed that they received fair treatment.

85. **Citizen satisfaction with access to the CU, and communication about complaints progress and results are fairly positive.** In the WB phone survey, 62.5% of respondents strongly agreed or agreed that they found it easy to reach the CU and inquire about procedures regarding complaint handling. Half of respondents also deemed that the CU had provided them with sufficient information regarding the progress of their complaint. In the GS, 57.5% of phone survey respondents either agreed (35%) or strongly agreed (22.5%) that it was easy to access the CU to follow up on their complaint. Respondents who disagreed primarily indicated that the process to search for their file took too long (44%), that the employee was not available (25%) or that the ministry employee was not ready to provide them with information on their complaint (19%); 67.5% of GS respondents also agreed or strongly agreed that the CU had provided them with the required information to answer their inquiry on complaint handling.

86. **Satisfaction with the outcomes of the grievance procedure, communication about results and timeframes is lower in the WB than in the GS.** Only 37.5% of phone respondents in the WB indicated that they were satisfied with the results of their complaint. In the GS, a much higher proportion of respondents expressed satisfaction (32.5% were "very satisfied" and 27.5% "satisfied"). Similarly, only 37.5% of WB phone survey respondents said they were informed of the results of their complaint, versus 64.1% of GS phone survey respondents. Finally, one citizen out of two in the WB phone survey was dissatisfied with the speed of the grievance procedure, while 65% of respondents in the GS phone survey agreed that the PLA CU addressed complaints in a reasonable time.

87. **Almost all of the complaints received by the CU are resolved:** 14 out of 17 complaints received in 2013 were resolved; and all 20 complaints received in 2014 were resolved.

D. Capacity-building

88. **One key limit to the PLA CU's effectiveness is the shortage of human resources**: the unit depends on only one employee to manage all the complaints, and this is in addition to other tasks the person is responsible for. As a result, most complaints received are transferred to the Chairman to solve the problem. There is also no separate physical office within the PLA to receive complainants.

E. Coordination, cooperation

89. **The first coordination issue that the PLA needs to solve is that of complaint focal points at levels lower than the PLA CU**. Currently, settlement offices do not have complaint focal points even though they are the first point of contact for most citizens. This would enable to capture many more

complaints, since the actual count of complaints only reflect the complaints that are received by the CU and not those received by the Chairman's office or the field offices.

90. **The relationship between the PLA CU and municipalities could also be clarified**, given that many complaints affect municipalities since they are related to land use, buildings, and property registrations.

91. **In addition, coordination and cooperation can be improved *within* the PLA**. In particular, departments receiving citizen complaints (e.g. surveying, control, internal audit, public relations departments) should know how to react and how to transfer these grievances to the CU.

5. Ministry of Health

A. Communication and awareness-raising

92. **Awareness of the MoH CU and of procedures to submit complaints is higher in the GS than in the WB.** While only 44.7% of WB face-to-face survey respondents were aware of the existence of the MoH CU, in the GS, 68.4% of face-to-face respondents did know about the CU.

93. **Less than half of the surveyed citizens have learned about the CU from an official ministry source.** Regarding sources of knowledge about the CU, 33% of WB face-to-face respondents said they learned about the CU by contacting the ministry, 25% via a previous complainant, 17% via a friend, 14% via the ministry's website/publications and 11% via a NGO/private body. GS face-to-face survey results showed that 28% of respondents knew of the CU by contacting the ministry; 24% through NGOs and private institutions; 21% through previous complainants; 17% from friends; and 10% from the ministry's website and publications. Therefore, it appears that the ministry is by far not the primary source of information regarding the CU. The results of the phone survey, which interviewed only actual complainants, show similar trends. For the WB phone survey, 45% of respondents knew of the CU via a friend, and for the GS phone survey, friends were a source for 42% of respondents.

94. **At least two thirds of citizens know about the procedures to file a complaint with the MoH CU, and while information about procedures has been primarily shared via personal contacts, the ministry has also played a key role in the dissemination of this knowledge**. Approximately two thirds of respondents in the WB face-to-face survey strongly agreed (35%) or agreed (32%) that they knew the procedures to file a complaint. For the WB, 37% of respondents knew about procedures thanks to previous complainants, while 33.3% said they knew of these procedures through the ministry's website/publications, 18.5% by calling the ministry, and 7.4% from a ministry employee. As for the GS, face-to-face survey results indicated that 86% of respondents either strongly agreed or agreed that they had previous knowledge of complaint procedures. As for means of knowledge of the procedures, 40% of respondents said that they knew through contacting the ministry by phone, and 36% through an employee at the ministry, while 16% said it was through the website or publications.[16]

B. Channels for grievance uptake

95. **The majority of citizens file their complaint in writing either by personal letters or dedicated ministry forms**. In the WB phone survey, 48% of respondents had submitted a personal complaint letter at the ministry, 28% filled out the dedicated complaint form at the ministry, 12% of them submitted a complaint by fax, and 12% through other means. In the GS, 38% filed a personal complaint letter, 21% the dedicated complaint form at the ministry; 21% per email; and 17% used fax.

96. **Complaints filed with other parties than the CU and reluctance to submit complaints to the CU suggest that citizens do not yet have full trust in the MoH CU.** The WB face-to-face survey revealed that more than half (54.3%) of respondents agreed they would submit a complaint to the MoH CU if faced with a problem. As for the GS, 57.9% of complainants said that they would file a complaint to the MoH CU if needed. At the same time, 32.8% of complainants interviewed by phone in the WB, and 66.7% of complainants interviewed by phone in the GS, said that they had filed their complaints through parties other than the MoH CU. For WB complainants, reasons given were, for 47% of respondents, that they

[16] AMAN report p.134-135

lacked confidence in the government's performance and professionalism, while 26% said that they were seeking support, backing, and legal advice, 16% filed their complaint to third parties due to the perception of highly bureaucratic measures at the MoH, and 11% because they were not aware of the CU. For GS complainants, reasons given were the need for external advice (33%), followed by lack of trust (27%) and desire to avoid bureaucracy (27%), as well as lack of knowledge of the CU (13%). 42.9% of WB face-to-face respondents filed complaints through parties other than the CU, but in their case, the main reason indicated was that they were seeking support, backing, and legal advice (47%), while 40% indicate lack of knowledge of the CU as the main reason why they sought for external help. In the GS, 48.1% of face-to-face respondents said they filed their complaint elsewhere than at the MoH CU. For them too, the most important reason was that they sought support and legal/technical advice (54%).

C. Consistency and quality

97. **Treatment of complainants seems satisfactory, although a number of respondents did not directly interact with CU staff**. The WB phone survey revealed that 43.1% of respondents did not meet any CU employee in the process of submitting their complaint. Of the remaining, 44.8% strongly agree or agree that treatment was fair and non-discriminatory, and 12.1% strongly disagree or disagree. GS phone survey results show that 58.3% of respondents strongly agreed or agreed that they were treated respectfully, neutrally and without discrimination. For approximately two thirds of the dissatisfied GS respondents, the main reason indicated was the perception of an unfair treatment which privileged some complainants over others, while 33% indicated discrimination based on gender.

98. **Complaint follow-up has not been easy for citizens.** According to the results of the phone survey, only 53.3% in the WB and 54.2% in the GS found it easy to access the CU to follow up on their complaint. For the WB respondents, the main reason for difficult access, quoted by 44%, was the lack of readiness on behalf of the CU employee to provide them with information. Another 25% said the employee simply had no new information regarding the status of the complaint, and 16% said the search for their file took too long. In the GS, those who disagreed indicated the same reasons as in the WB: for 27% of them, it was because of the lack of readiness of the employee to provide information on the complaint, for 27% of them, the length of time it took to retrieve their file, for 18%, the absence of updated information, and 27% said the employee was absent from his/her desk/office. Results of the WB phone survey show that only 31% of complainants agreed or strongly agreed that they had received sufficient information from the CU on the progress of their complaint. In the GS phone survey, this figure is higher: 58.3% of complainants were satisfied with the quantity of information they received from the CU on their complaint.

99. **Citizen satisfaction with outcomes, timeliness and quality of communication seem insufficient in the WB.** Satisfaction rates with the outcomes of the grievance process were very low in the WB phone survey: only 12.3% of interviewees were satisfied. 50% said they intended to appeal the results. Dissatisfaction with outcomes seems to have been related to the time it took to address complaints: only 24.2% of respondents in the WB felt this had been done in a reasonable time. Communication about the results also played a role, since only 24.1% of WB citizens claimed they had been informed of the outcome of their complaint. As for the GS, 79.2% of complainants said they were satisfied with the results of their complaint and only 14.3% of dissatisfied complainants were considering to appeal. 58.3% were satisfied with timeframes, and 66.7% said they were informed of the result of their complaint.

100. **Regarding outcomes, data provided by the MoH showed that almost all complaints were accepted** (more than 95%). In 2014, all 86 complaints received by the CU were resolved, and Ministry officials said that most complaints are resolved quickly because of their urgent character (e.g., patient treatment).

D. Capacity-building

101. The MoH CU has four employees which use the MIS to help analyze trends in MoH performance and problem areas.

E. Coordination, cooperation

102. **The situation of the MoH CU in regards to coordination with lower levels is quite specific: most complaints are received and resolved in the hospitals, health care centers or other front line health care providers**. They do not go to the CU and are thus not tracked (complaints are captured by the MoH CU database only if they are not resolved at the health care facility and are received by the CU).

103. **At the same time, there is no formal CHM at the service provider level**, i.e. no dedicated person or system for dealing with complaints at that level (except in the Ramallah Medical Complex). The CU therefore has little information about the complaints handled and resolved by front line health care providers.

104. **Other MoH departments are generally cooperative in handling complaints**. About 90% of the complaints received by the CU come from within the MoH and the other 10% are referrals from outside the MoH such as the Independent Commission on Human Rights. Complaint handling is seen as a high priority by the Minister of Health. Almost all recommendations to the Minister of Health by the CU are approved. MoH CU staff also participated in the workshops and consultations for developing the DGC's CMS.

Box 4: Improved Customer Relations Leads to Improved Service Provision: Complaints Handling in the Palestinian Medial Complex, Ramallah

In Palestine, deteriorating socioeconomic conditions, restrictions on movement, and limitations on import of medical equipment and medicines prevent the development of a universally accessible, affordable and responsive healthcare system. The Palestinian Medial Complex (PMC), which comprises of five hospitals in Ramallah, provides a wide range of services including neonatal care, maternity care, internal medicine, pediatrics, general surgery, and cardiovascular surgery. The PMC has made great strides in providing quality health services to its patients by adopting a number of measures, such as establishing a culture of continuous improvement; adoption of patient safety goals;[17] and the rollout of a responsive complaint handling system (CHS) and a patient satisfaction assessment.

In 2013, the leadership of PMC created a complaint handling system to increase patient and family satisfaction with the health services provided by the hospital. The complaint system was based on Patient Safety Primary Initiative Criteria established by the WHO (2008) as well as Quality Council Meetings in the Palestine Medical Complex. Prior to 2013, complaints were handled informally without any documentation or data analysis often leading to no corrective actions and sometimes leading to altercations with patients and their families.

In 2013, the PMC adopted a Patient and Relatives Complaints Policy that emphasized the right of patients and their families to express their complaints and dissatisfaction. The policy specifies complaint collection and resolution procedures and staff roles and responsibilities. Consequently complaints were received through standardized forms, face-to-face or through complaints boxes set up in prominent locations inside the PMC. Staff were trained to assist patients and their families in filing complaints and submitting suggestions. A complaint management module which is part of the hospital's management information system was also developed allowing management to track and monitor complaint resolution. The complaints system is administered by the Head of the Complaints Department and Quality Unit in PMC with the support of a Patients' Rights and Ethics Committee. They together are responsible for receiving/responding to all complaints and suggestions; analyzing and reporting upon them; and following-up with relevant departments to ensure that appropriate corrective procedures are adopted.

The successful implementation of these reforms, have resulted in high patient satisfaction, reduction in the number of complaints, and better quality health services. This is illustrated through the results of a patient survey in 2015 in which 89% of respondents rated medical care and nursing as excellent or very good; and 70% rated food and catering services as excellent or very good.

The key CHS success factors are – committed PMC management; decentralization of decision making; a strong belief in the rights of patients and their families to voice their concerns and the adoption of a 10 point "Your Rights and Responsibilities Charter"[18]; a written complaints policy which has been widely disseminated to all hospital staff and implemented; an emphasis on learning more about the needs of staff and patients after analyzing complaints received and taking corrective actions; and finally continuous follow up on all complaints and constant communication with complainants.

[17] These safety goals were established by the Joint Commission of Accreditation and the World Health Organization.
[18] Patients are requested to sign the charter which introduces them to their 10 rights - right to receive treatment; right to receive appropriate and continue medication, approval based on awareness and understanding, respect for the dignity and privacy of patients, confidentiality, right to ask the identity of the service provider, the right to ask for additional consultation on the patient's situation, and right to access information and medical records.

6. Directorate General of Complaints

A. Communication and awareness-raising

105. **The DGC has shown great enthusiasm about the added-value of the Complaints Management System (CMS) and plans to create communication materials about it.** The DGC has produced videos explaining to potential complainants both how the CMS works and what the entire process looks like, to allow citizens to be fully informed before they submit a complaint via the CMS. A full-fledged communication campaign is planned when the CMS is ready for launch.

B. Channels for grievance uptake

106. **The CMS will diversify the range of channels for grievance uptake.** The DGC received few complaints directly as most of them go to the CUs and staff in the Ministries. However, the CMS will allow CUs to accept complaints submitted online, and this is expected to contribute to the capture of a wider range of complaints.

C. Consistency and quality

107. **The DGC's provision of guidelines to all ministries has standardized complaint handling in the Palestinian Authority to a significant extent, and the operationalization of the CMS should significantly improve the transparency, public access, efficiency, and effectiveness of complaints handling.** The CMS will be the cornerstone of the DGC effort to strengthen complaint handling over the next year or two.

108. **However, apart from rolling out the CMS, there currently is no strategic plan with a specific timeline for the DGC**. Identification of priority areas may be required to establish a clearer institutional vision for the Directorate.

109. **It is planned that the CMS will improve ease of communication with complainants about status updates**. After being assigned a unique ID via email, the complainants will be able to log in to the CMS and see the status of their complaint. Internal CMS users will be able to see exactly where a complaint is in a ministry workflow for complaint handling. The DGC is optimistic that this will reduce delays in complaint processing. The CMS will generate automatic "flags" or alerts if any step in the CH workflow is taking longer than the allotted time. Previously, complaints could languish and no one would know where or why the complaint was stalled. Ministers will now have a dashboard view where they can see the status of complaints within their ministry.

110. **The CMS will also allow citizens to voice their opinions about the software.** The CMS will have a brief user satisfaction survey so it will provide immediate feedback by users on their experience with the CMS.

D. Capacity-building

111. **In terms of DGC capacity, donor support seems to have been critical to the DGC's activities to date.** For example, USAID provided support which led to the TOR for the CMS. Democratic Control of Armed Forces (DCAF), an international organization based in Geneva, provided assistance in diagnosing the existing legal framework for CHMs and helped develop the amended bylaws for strengthening the DGC. Each of the DGC's two sections has one officer and one secretary. Therefore it is a very small organization despite its significant responsibilities. The DGC sometimes uses students and volunteers

because they are so short-staffed. The DGC thus seems to have relatively little internal capacity, and too few resources, financial and human, to handle all its responsibilities. This shortfall will be greatly exacerbated by the launch of the CMS.

112. **The DGC's reporting and recommendations could be strengthened**. In the light of the limits of the existing Regulation, the DGC has submitted amended bylaws to the Prime Minister's Office, but they are still awaiting action more than a year after submission. Furthermore, the DGC can plan a strong role in building capacity of staff in the CUs of Ministries.

E. Cooperation/coordination

113. **It is hoped that the CMS will allow for a more streamlined handling of complaints across ministries**. A progressive phasing-out of ministry CHM databases is planned, to allow for all ministries to eventually use the CMS. Ministry CU databases are currently being migrated to the CMS. The CMS will use keywords and drop down menus to help direct the complaint to the correct government unit to submit the complaint.

114. **However, there could also be some degree of resistance to the CMS.** Several ministries (e.g. the Ministry of Interior) have their own CHM MIS and may be hesitant in adopting the CMS. The CMS will need to be adapted to ministries to be accepted and function effectively. The CMS will make the ministries transparent to the DGC on complaint processing, but it is not known how the ministries feel about being micromanaged on complaints management.

5. Suggestions for improvement

115. **The activities undertaken through this technical assistance have helped identify several areas that need improvement in the existing complaints handling processes of the DGC, the four Ministries and the PLA.** These are summarized below in two parts – (i) cross-cutting areas for improvement which are relevant for all Ministries; and (ii) Ministry specific suggestions for improvement (some of these overlap to emphasize nuances and discussions). All entities requested additional staff, equipment, furniture and cars which will allow them to perform better. The suggestions for improvement exclude these requests and focus on the complaint management process that can be undertaken by the Ministries in the next 1-2 years to strengthen their CHMs. It is evident from the survey that citizens lack trust in the ministry CHMs. The steps outlined below will help begin the process of building the trust and confidence of citizens. Given the evident resource constraints, both financial and human, it will be key to prioritize these areas, mobilize internal and external resources from within the Ministry itself and development partners, and then implement relevant actions. The MOEHE example (see Box 2) clearly indicates that several actions can be taken internally by Complaints Units. Similarly, lessons from the CHM of the Ramallah Medical Complex (see Box 4) can be learnt and scaled up easily. Such commendable initiatives should be encouraged further.

Cross-Cutting Areas for Improvement

- **Perception and Role Clarity** – The dual accountability of the CU to the Minister and the DGC often causes conflict. The CUs are often neglected by other departments within the Ministry. Senior management buy in, as has been done in MOSA and MOEHE, will empower CUs and allow them to compete for internal funds. Further, clarifying roles and responsibilities of the CU vis-à-vis other departments within the ministry and the CU and the DGC will help improve coordination and position them to play a supportive rather than oversight role.

- **CHM Structure and Coordination** – The CU is a coordinating unit and has to collaborate with other departments and lower levels to resolve complaints. Instructions should be issued to all other departments within the ministry to ensure this collaboration and also to systematically forward complaints received to the CU. Further, CHM focal points need to be designated at lower levels. The work of the CU also needs to be proactively coordinated with other institutions (public or private/not for profit) that receive complaints, such as NGOs, ombudsman, etc., with the goal of making it easier for citizens to get redress.

- **Business Processes** - Each ministry should adapt and customize the DGC-issued generic guidelines according to their programs, complaint categories, resolution timeframes and workflows (which will first need to be mapped out). These guidelines will enumerate standard operating procedures for each stage of the complaint management process, from sorting and processing (logging of complaints) to acknowledgement and follow-up (receipt and progress updates), verification, investigation and action-taking (including mechanisms for escalation), and finally feedback for the CHM users and the public at large. These procedures will assign clear responsibilities of complaint handling to existing officials, especially at the regional directorates, on how to receive, log, monitor or track complaints. These should also include templates/checklists for all staff dealing with complaints handling. MOSA through this TA has created a set of ministry-specific guidelines and the MOH is currently doing the same.

- **Complaint Receipt** – Most complaints are received face-to-face and only recorded if they are in written form (as stipulated in Resolution No. 6). Steps should be taken to diversify complaint uptake channels (in the Gaza Strip, email and fax are popular channels for submitting complaints) and record all complaints – verbal, written and electronic through social media. Attempts to capture complaints received at lower levels and/or by other departments within the ministries should also be made. The Complaint Management System (CMS) should be finalized and rolled out as soon as possible.

- **Monitoring and analysis** – The capacity of the DGC and CUs to analyze complaint data and trends needs to be enhanced. This will allow the unit to generate high quality reports that will allow senior management to use the CHM as a performance management tool. Indicators that measure resolution rates, average resolution times, and complainant satisfaction rates (preferably disaggregated by Governorate and gender) will allow benchmarking. The inclusion of an indicator on average resolution times by ministry will allow the DGC to publicize and enforce stipulated resolution time frames.

- **Communication** – In most cases, complaints are not acknowledged or the resolution is not communicated to complainants. All CUs should inform the complainant of the action taken. If not satisfied, the complainant should be informed of appeal procedures. Materials should explain eligibility criteria for different ministry programs, how and where to submit complaints for beneficiaries, appeals processes, how to track their complaint, etc.

- **Citizen awareness and facilitation** – It is evident from the survey findings that most citizens (even some complainants) are not aware of the existence of the Complaints Unit, the contact points, complaints handling processes and/or appeals procedures. If, however they, especially women, knew about the CU and its processes, it is through friends/relatives or other complainants, reinforcing the need for an information campaign that enhances awareness of the CHM for *all* citizens, including those with disabilities or lower educational levels. The most popular recommendation by survey respondents to improve performance and effectiveness of CUs in WB and GS was to "conduct awareness programs for citizens regarding procedures of filing complaints." Proactive outreach to citizens and users of the services provided by ministries will promote citizen awareness about the CHM. Furthermore, staff can facilitate the submission of a complaint. Developing and implementing a media plan, accompanied by the necessary communication material and activities, both at the DGC and the Ministry levels, will make the CHM more citizen centric.

- **Capacity Building** –The survey revealed that there was high demand from staff for training around CH processes, communication, case management, data entry, complaint management system, customer service protocols, data reporting and analyses, human rights, etc. Creating a pool of locally available CHM master trainers who can conduct just-in-time trainings would be helpful. Documenting best practices in CH from the field and sharing them with staff will help. The DGC, in collaboration with other CUs and possibly the Independent Commission for Citizens' Rights (ICHR), is best positioned to lead training activities. Further, there is no unified concept of complaints among staff as a result of which some complaints are not registered. CHM trainings can bring staff on the same page.

- **Complaint Satisfaction** – A significant number of surveyed complainants were not satisfied with the resolution of their complaint and due to a lack of trust and the belief that they needed connections (*wasta*) were not willing to appeal. Periodic rapid satisfaction surveys, conducted by the DGC or the concerned ministries, will help build citizen-state trust. The CMS captures phone numbers of most beneficiaries. This should make it easy to conduct periodic complainant/beneficiary satisfaction surveys. The CMS will also allow citizens to easily follow up on their complaints which currently is a time-consuming and frustrating process.

Specific recommendations for the Ministry of Social Affairs

- **Appoint CHM focal points** within regional offices.
- **Capture as many complaints as possible in existing MIS**, especially those received through social media; make the module available to pilot Directorates so that they also can enter complaints directly. Issue instructions to other departments to forward complaints received to the CU. This will also help in identifying repeated complaints, i.e. the same complaint being submitted at various levels, which will in turn save staff time and increase efficiency. Consider harmonization of MOSA CHM module with the CMS once it is ready for rollout.
- **Train staff, especially social workers, on CHM processes** based on the recently developed MoSA-specific CHM manual.
- **Improve reporting and analysis of complaints** by enhancing capacity of staff in the Complaints Unit and the CHM focal points in the regional offices.
- **Monitor the quality of resolution by capturing complainant/beneficiary satisfaction** with the CHM.
- **Remodel offices, to the extent that funds permit, to create a visitors' reception area** in all other Regional Directorates as has been done in the pilot Directorates of Jenin and Abu Dees and the MoSA Complaints Unit.
- **Develop and implement a media plan to make CHM visible** both internally (within MoSA) and externally to citizens. Distribute recently created brochures and posters to regional offices.
- **Launch an awareness campaign** in the pilot Regional Directorates (Jenin and Abu Dees), which can be expanded to all other Directorates in phases.
- **Adapt communication materials to remove barriers to access for segments of the population with lower education levels** and disseminate information to the public in a manner accessible to all, regardless of educational background.
- **Ensure that complainants receive high-quality customer service and the necessary privacy** when they submit their complaint in writing in person at the ministry, and are informed about next steps.
- **Modify the complaints MIS to allow for complaint tracking**, clearly indicating at which stage the complaint currently is and what action has been taken so far. Facilitate access to this information by complainants.

Specific recommendations for the Ministry of Education and Higher Education

- **Appoint focal points for complaints handling** at the Regional Directorate (either in the Internal Audit Units there or elsewhere) and University levels.
- **Issue clear instructions to refer and/or report all complaints received in other departments and at other levels (e.g. Regional Directorates, etc.) to the CU.**
- **Develop a media plan, awareness campaign and communication materials** to increase awareness about CHM with a special focus on providing effective communications for citizens regardless of their educational background and raising gender sensitivity and awareness of complainants' rights amongst staff.
- **Adopt, customize and strengthen the CMS and capture as many complaints as possible**. Most of the complaints are resolved at the school level and not tracked by the CU. This would facilitate more comprehensive analysis of complaints which could then be used by management as a tool to identify problem areas and improve performance.
- **Include higher education institutions in the CHM.**
- **Develop a MoE specific CHM manual** which addresses education specific issues, such as complaints related to teacher recruitment and student registration in schools and universities.
- **Train relevant MoE staff** involved in complaints handling.

Specific recommendations for the Ministry of Local Government

- **Customize existing DCG guidelines to MOLG and its programs**. These procedures will assign clear responsibilities of complaint handling to existing MOLG staff, especially in the regional offices. These should also include templates/checklists for all staff dealing with complaints handling. These procedures need to be incorporated into a manual that is shared with all MOLG staff that might receive a complaint.
- **Develop an overarching framework for basic complaints handling systems and standard operating procedures that can be shared with other municipalities**, especially village councils and joint service councils. Complaints received by the MOLG relate to other local government units so they are often more complicated and require longer resolution times. This should include a process by which all calls/communication regarding complaints that require any follow-up action and/or investigation are passed to the CU for entry into the MIS.
- **Strengthen (and establish, where necessary) CHMs in municipalities** with citizen service centers. Share and disseminate lessons from municipalities with functioning CHMs. Establish CHMs where local government units do not have citizen service centers by embedding them in all local government projects.
- **Sensitize senior management** towards the importance of complaints handling and encourage them to act upon the recommendations submitted by the CU. It was evident from the survey that a much higher number of complainants approach other parties in MOLG as compared to other ministries.
- **Designate CHM focal points in regional offices and local government units** (LGUs).
- **Adopt the CMS** and attempt to capture all complaints being received directly by MOLG staff in writing or to the extent possible, verbally.
- **Develop a CHM media plan to increase awareness**. Relaunch an outreach campaign (on the lines conducted in 2012 with support from the Belgian Technical Cooperation) with updated communication material to inform people how to submit complaints.
- **Create training material and train all ministry and LGU staff** involved in complaints handling (preferably through joint trainings). The training should be centered on the staff manual for dealing with complaints and promote customer-oriented and fair treatment of complainants, regardless of gender.
- **Explore opportunities for the CU to provide legal assistance,** possibly through partnerships with existing NGOs, to complainants; provide specialized legal trainings to CU staff for them to be able to handle complaints related to legal aspects of local government.

Specific recommendations for the Palestinian Land Authority

- **Sensitize senior staff on complaints handling** through information sessions. This will help provide space for the CU to operate and improve coordination with other PLA departments (e.g. so that complaints received by other departments are referred to the CU).
- **Increase staff in the one-person CU.**
- **Identify CHM focal points in all field and settlement offices.**
- **Develop and share standard procedures** to record or monitor complaints received in the field offices. Clarify relationship related to complaints handling between the PLA CU and (a) settlement offices; (b) municipalities; (c) other PLA departments.
- **Build capacity for complaint handling staff**, notably on legal issues related to land management.
- **Adopt the CMS**.
- **Develop a media/communication strategy** targeting both internal (PLA staff) and external audiences (citizens at large). Improve the PLA website, for example by (a) mentioning the CU and methods of reaching it, (b) publishing the organizational structure of the PLA.

Specific recommendations for the Ministry of Health

- **Expand the role of the CU** from receiving complaints and establishing committees to coordinating/monitoring CHMs in all health facilities, investigating complaints and conducting spot checks. Assign a person to deal with complaints at all health facilities. Lessons from the Ramallah Medical Complex CHM (see Box 4) can be learnt.
- **Complete development of and implement MoH specific CHM guidelines** building on existing DGC guidelines (e.g. taking into account the frequent urgency of the complaints, privacy issues in health care, etc.).
- **Adopt the CMS and capture as many complaints as possible** right from the CU level in Nablus and Ramallah to the hospitals, health care centers/facility levels. Most of the complaints are resolved at these levels and not tracked by the CU. This would facilitate more comprehensive analysis of complaints which could then be used by management as a tool to identify problem areas and improve performance.
- **Expand the number of complaint uptake channels** to include social media and internet.
- **Create a media plan and communication materials** and launch an information campaign to promote awareness about the CHM and its processes. Communication regarding the MoH CU and the procedures to submit complaints are non-existent. This communication should also inform beneficiaries and complainants on their entitlements in regard to legal advice
- **Train relevant MoH staff** involved in complaints handling.

Specific recommendations for the Directorate General of Complaints

- **Roll out the Complaint Management System** (CMS) to all Ministries after making ministry-specific adjustments in a phased manner. The CMS will be the cornerstone of the DGC effort to strengthen complaint handling and will establish a much needed electronic link between complaints databases in various ministries. An information campaign with the public and concerned ministry staff will be necessary to make them aware of the CMS and how to use it. Manuals, other guidance materials, and training will be necessary for staff to use the CMS effectively.
- **Coordinate the development of training material** on topics such as case management, complaint management system, customer service protocols, data reporting and analyses, etc. Organize workshops/sessions in collaboration with ministry CUs to CHMs.
- **Follow up to get approval of amended bylaws** to existing Regulation No. 6. This will strengthen the DGC's ability to ensure that the CUs are able to resolve complaints in a timely manner; coordinate resolution of complaints that involve more than one ministry; and clarify roles of CUs further, making it easier for citizens to submit complaints. One frequently repeated issue was that complaints are not considered official until they are submitted in writing. The existing regulation should relax this requirement.
- **Publish periodic reports, preferably annual,** stating the performance of all ministries in complaint resolution. These reports should contain information on aspects such as resolution rates, average resolution times, success stories and complainant satisfaction scores, to create citizens' confidence and trust in ministries.

6. Next steps

116. Given the World Bank's institutional mandate on grievance redress, the Palestine Authority's (PA's) commitment and efforts to address complaints from Palestinian citizens, and the progress made so far in the current TA, there is a strong case to continue supporting the DGC's efforts to strengthen the country CHM, rather than improving CHMs project-by-project. An integrated approach towards strengthening the PA's CHM is likely to result in cost savings, greater efficiency and effectiveness, and better implementation of the World Bank institutional mandate on grievance redress.

117. The TA has generated high client interest amongst the concerned Ministries and the DGC which is reflected in the ministry-specific action plans that have been generated through this TA. A follow-up through a second phase of this TA will help support the targeted ministries and the DGC in piloting recommendations from the assessments and expand the activities to other additional Ministries. Presentations to several development partners were made in the February 2016 mission and a few of them (British Council, AfD, USAID) expressed an interest in the complaints handling area. Some possible activities to consider in Phase 2 of this TA, subject to availability of funds, are:

- Technical assessment of and support to strengthen/roll-out the Complaints Management System (which is currently being developed in-house by the DGC).
- Refinement of work flows for complaints handling in targeted Ministries.
- Sensitization of senior management in all targeted Ministries towards CHMs.
- Technical (and to the extent possible, financial) support to the targeted Ministries to implement the suggestions for improvement and their action plans.
- Capacity development of staff in Complaints Units to improve management of citizen complaints and use Complaints MIS.
- Development of communications material (both internal for Ministry staff; and externally for CHM users) for the remaining Ministries.
- Expansion of CHM strengthening activities to an additional 5 Ministries, subject to the availability of funds.

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Annex 1 – Survey Instruments

Opinion Poll on Status of Complaints Units—Face-to-Face Survey Instrument*

Demographic Data

Age: _____

Educational Level:

1. Illiterate
2. Primary education
3. Preparatory education
4. Secondary education
5. College/institute
6. Bachelor of Arts (B.A.)
7. Master's degree and/or Ph.D.

Work Status:

1. Employed
2. Unemployed
3. Housewife
4. Student
5. Retired
6. Unable to work

Work Sector (worker only)

1. Public/government sector
2. Private sector
3. NGOs
4. UNRWA
5. International Institutions

Monthly average income: _____NIS

Part 1:

Interview with a client filing a complaint

S1_1—How did you know about the complaints unit in the ministry?

1. Called the ministry
2. Through a friend
3. Ministry's electronic website or brochure
4. Previous complainant
5. Through a private institution or NGO
6. Other (please specify): _____

S1_2—Have you filed your complaint to another party before heading to the ministry?

1. Yes
2. No

If your answer is *No*, skip to question S1_3.

S1_2a—Why did you file your complaint to another party?

1. Did not know about the ministry's complaints unit.
2. Do not trust the performance and professionalism of government institutions
3. To decrease the time needed for the bureaucratic process
4. Asking for support and legal advice
5. Other (please specify): _____

S1_2b—With whom did you file your complaint?

1. Complainants unit at the council of ministers
2. Private institutions/Human Rights Commission/NGO
3. Member of Parliament
4. State Audit and Administrative Control Bureau
5. Anti-Corruption Commission
6. Other (please specify): _____

S1_3—Do you agree with the statement: You have previous information about the procedures for filing a complaint?

1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion

If your answer is *disagree* or *strongly disagree*, skip to question S1_4.

S1_3a—How did you know about the procedures for filing a complaint?

1. Called the ministry
7. Ministry's electronic website or brochure
2. An employee inside the ministry
3. Previous complainant
4. Other (please specify): _____

S1_3b—Did you ask for help from any of the ministry's employees or officials before visiting the ministry?

1. Yes
2. No
3. No opinion

S1_4—Did you seek help from an employee or an official from outside the ministry to follow up on your complaint?

1. Yes
2. No
3. No opinion

S1_5—If your answer to the previous questions is *Yes*, why did you seek help?

1. To shorten time, bureaucracy, and procedures
2. Do not trust the performance and professionalism of the handling complaints unit and/or the ministry
3. Asking for support and legal advice
4. Following recommendation of a previous complainant
5. Other (please specify): _____

S1_6—If you are not satisfied with the result of your complaint, will you appeal the decision?

1. Yes
2. No
3. No opinion

S1_6a—If the answer is *No*, why?

1. Do not believe that result could be improved
2. Procedures for filing complaints and follow up and slow/time-consuming
3. Do not believe there is no need for mediation
4. Other (please specify): _____

_____

* Survey instruments were designed by AMAN and Qiyas in consultation with the World Bank team.

Part 2:

Interview with client asking for service, *not* to file a complaint, and who has never filed a complaint with the ministry.

S2_1—Do you know about the complaints unit of the ministry?

1. Yes
2. No

S2_2—If you encounter a problem with the ministry regarding a service you requested or a right you are entitled to, would you file a complaint with the complaints unit?

1. Yes
2. No
3. No opinion

S2_3—Have you ever had a problem receiving service from the ministry and resorted to a party other than the ministry's complaints unit for recourse?

1. Yes
2. No
3. No opinion

S2_3a—If the answer is *Yes*, was the complaint handled/solved?

1. Yes
2. No
3. No opinion

S2_3b—If the answer is *No*, did you seek help from an employee or an official from outside the ministry to follow up on the complaint before visiting the ministry

1. Yes
2. No
3. No opinion

S2_3c—Has your complaint been resolved?

1. Yes
2. No
3. No opinion

S2_4—If you do not want to file a complaint with the ministry, would you file it with another party?

1. Yes
2. No
3. No opinion

S2_4a—If *Yes*, to what party?

1. Complainants Unit at the Council of Ministers
2. Private institution
3. Member of Parliament
4. State Audit and Administrative Control Bureau
5. Anti-Corruption Commission
6. Ask for help from an official
7. Other (please specify): _____

S2_5— If you do not want to file a complaint with the ministry, why not?

1. Do not trust performance of government
2. Believe there is a need of mediation
3. Complaints filing and follow-up procedures are slow
4. A recommendation from a friend who previously filed a complaint
5. Filing a complaint with a private, independent institution is more effective
6. Other (please specify): _____
7. No opinion

Citizens' Opinion Poll on Status of Complaints Units

Questionnaire for Telephone Interview with Complainant

General Information

Questionnaire No. _____
Researcher No. _____
District: _____
Ministry: _____

Place of Residence:

1. City
2. Village/town
3. Camp

Gender:

1. Male
2. Female

1—How do you know about the complaints unit in the ministry?

1. Called the ministry
2. Through a friend
3. Ministry's electronic website or brochure
4. Previous complainant
5. Through a private institution or NGO
6. Other (please specify): _____

2—How did you file your complaint to the ministry?

1. Visited the ministry and filed a complaint form.
2. Visited the ministry and submitted it in writing (but not in a complaint form)
3. Faxed a letter of complaint to the ministry
4. Emailed a letter of complaint to the ministry
5. Filed complaint by telephone
6. Sent complaint through a private institution or NGO
7. Other (please specify): _____

3—Have you filed your complaint to another party before heading to the ministry?

1. Yes
2. No

3_1—If your answer is *Yes*, why?

1. Did not know about the ministry's complaints unit
2. Do not trust the performance and professionalism of government institutions
3. To decrease the time needed for the bureaucratic process
4. Asking for support and legal advice
5. Other (please specify): _____

4—Do you agree with the statement: The complaints unit clearly informed you of the procedures and follow-up mechanisms involved in filing a complaint.

1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion

4_1—If the answer is *disagree* or *strongly disagree*, why?

1. Complaints form is difficult
2. No form provided for filing the complaint
3. Employee of complaints unit was uncooperative
4. Location for filing complaints in unsuitable
5. Other (please specify): _____

5—Do you agree with the statement: The unit team treated you respectfully, neutrally, and without discrimination?

1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion

5_1—If the answer is *disagree* or *strongly disagree*, why?

1. Complaints Unit offers information and pays more attention to other complainants
2. Gender-based discrimination
3.. Complaints not handled in proper order (line is not respected)
4. Other (please specify): _____

6—Do you agree with the statement: It was easy to reach the complaints unit and inquire about the procedures for complaint handling

1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion
6. Other (please specify): _____

6_1— If the answer is *disagree* or *strongly disagree*, why?

1. Took a long time to find the complaints unit
2. Unit employee not prepared to offer information about the complaint
3. Unit employee lacked updated information on the status of the complaint
4. The specialized employee is frequently not in the office
5. Must be personally present at the ministry to follow up on a complaint
6. Other (please specify): _____

7—Do you agree with the statement: The complaints unit provided you with all information about your inquiry of handling a complaint?

1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion

8—Do you agree with the statement: Your complaint was handled in a reasonable time?

1. Strongly agree
2. Agree
3. Disagree

4. Strongly disagree
5. No opinion

9— Do you agree with the statement: The unit employee informed you of the result of the complaint?
1. Yes
2. No

9_1—If the answer is *Yes*, how were you informed?
1. In writing
2. Orally, in person
3. By telephone
4. By email

10—If the answer is *No*, when you revisited the unit, was it easy to find your file and receive a quick response?
1. Strongly agree
2. Agree
3. Disagree
4. Strongly disagree
5. No opinion

11—Did you ask any ministry employee or official to follow-up on your complaint?
1. Yes
2. No
3. No opinion

12—Did you seek help from an employee or an official from outside the ministry to follow up on your complaint?
1. Yes
2. No
3. No opinion

13—In general, are you satisfied with the result of your complaint?
1. Strongly satisfied
2. Satisfied
3. Dissatisfied
4. Strongly dissatisfied
5. No opinion

14—If you are not satisfied with the result of your complaint, do you plan to appeal the decision?
1. Yes
2. No
3. No opinion

14_1—If no, this is because:
1. You do not trust improving the results
2. Procedures of appeal are complicated
3. I believe there is a need for mediation to have the appeal succeed
4. Other (please specify): _____

15—If a problem relating to the ministry's services reoccurs, would you file it with the complaints unit?

1. Yes
2. No
3. I do not know

15_1—If the answer is *No*, why?

1. Dissatisfied with result of complaint
2. Filing and follow-up procedures for complaints are slow
3. Complaints unit does not take its role seriously
4. Other (please specify): _____

16—If you encounter another problem and do not wish to file your complaint with the ministry, to whom would you direct your complaint?

1. Complainants unit of the Council of Ministers
2. Private institutions/Human Rights Commission/NGO
3. Member of Parliament]
4. State Audit and Administrative Control Bureau
5. Anti-Corruption Commission
6. I ask for help from an official
7. Other (please specify): _____

17—What actions would you recommend to improve the complaint unit's performance and effectiveness?

1. Increase number of employees in the unit
2. Facilitate complaint-filing procedures
2. Conduct awareness programs for citizens regarding complaint-filing procedures
4. Adopt electronic means for filing complaints
5. Other (please specify): _____