DANCHURCHAID Complaints Report

2011

This is the third Complaints Report describing the development of DanChurchAid’s Complaints Handling System (CHS) and including a list of complaints received. The report covers the calendar year 2011 and is thus synchronised with the Anti-corruption Report. All reports (2009, 2010 and 2011) are available at the DanChurchAid website.

Part 1 shows general information about discussions and adjustments in connection with the daily administration of the complaints system.

Part 2 lists the complaints received through the Complaints Handling System in Copenhagen.

Part 3 lists the handling of complaints in some of the decentralised Complaints Handling Systems in Malawi, Ethiopia, Cambodia, India, Myanmar and the Humanitarian Mine Action programme in Angola.¹

Part 1: General Information

From 1 January 2011 to 31 December 2011 the office in Copenhagen received 35 complaints. This is one less than in 2010. The complaints are of both sensitive (2) and operational (33) character and include our Danish as well as our international activities. There is a considerable reduction in the number of sensitive complaints received in 2011; specifically a reduction from 11 corruption cases in 2010 to one corruption case in 2011. Thus 10 corruption cases less were handled in our system in 2011. The report also includes follow-up on previous corruption cases, as it may take up to two years to conclude a corruption case involving a partner. In addition we had one case about violation of our code of conduct.

Though no documentation is available, the reason for the above mentioned reduction in corruption cases could be that in 2009 and 2010 we “cleared out” corrupt employees and partner organisations. In addition, we have held both anti-corruption workshops, partner workshops on the structure of the complaints system and on security; the cases as well as the disciplinary measures taken towards corrupt employees have been published.

¹ This report summarises especially information about some of the complaints made through the different complaints handling systems in Malawi, HMA Angola, Ethiopia, Cambodia, Myanmar and India. The reason for this summary is that the complaints are based on very different pieces of information from the partner organisations and they often mention names and places of the persons involved.
The operational complaints concern primarily our street fundraising and our telemarketing campaign, when people are contacted by telephone. Both campaigns are very important fundraising activities for DanChurchAid. The number of complaints should be compared to the fact that we contact approx. 130,000 persons annually in the streets through our face-to-face campaign, and that in 2011 we telephoned approx. 223,000 persons. However, some of these did not answer the phone. On that background the number of complaints is very limited, fortunately.

Transparency by publishing corruption cases

Corruption cases are currently published at the DanChurchAid Danish and English websites, www.noedhjaelp.dk/anti-korruption and http://www.danchurchaid.org/about-us/quality-assurance/anti-corruption/cases. The purpose is to ensure transparency to donors, media, external donors and other stakeholders. We want to show that corruption or suspicion of corruption is taken very seriously and that we have nothing to hide, not even in sensitive cases. Most often, the character of the cases is sensitive and in the investigative phase based on accusations without proof; therefore it is very important that what we choose to publish is not harmful to the person, the organisation or the further investigation of the case. Thus we assess from case to case what should be published. DanChurchAid has decided that the names of individuals involved in a complaint are not published. If we find that publishing the name of the country will harm the victim, or if there is a considerable risk for aggravating the role of the victim, the name of the country in question will not be published. The reason is that DanChurchAid has relatively few employees in each country, and it will be very easy to identify the complainants or the victims. On behalf of DanChurchAid, the DanChurchAid Board member, attorney Thorkild Høyer, will go through specific cases in order to secure the quality of the processing of the case.

Other cases

Quite a number of the complaints in the other cases includes a lessons learned. The complaint has been followed by an adjustment of procedure or an internal discussion with a view to prevent further complaints. However, we also see that in a number of cases there are already clear procedures and guidelines, which in the specific case may not have been observed; but the case does not necessarily require further follow-up than stressing the existing guidelines.

In general, the system still functions well, and there is a basic backing and understanding of the system in large parts of the organisation. During the year we carried out an internal review of the system (see below), and a Danida review and the HAP certification (Humanitarian Accountability Partnership) have also given a few recommendations which we currently are working with in order to create the best possible system.

---

2 The figure is based on the fact that we get 13,000 new members every year. On average, maybe one out of 100 persons we approach in the streets becomes a member, meaning that we contact approx. 130,000 persons.
**Internal review of the Complaints Handling System**

According to the Internal Review of the Complaint Handling System (CHS), it is a general view among the interviewed staff that the CHS is a great asset when dealing with a concrete sensitive complaint. Through interviews with DCA employees involved in the handling of operational complaints it is evident that the system is regarded as an asset for the organisation.

In the survey, 95.2% of the respondents\(^3\) answer that they are aware of the DanChurchAid CHS. In addition, 77.4 % of the respondents indicate that they know when they should make use of the CHS. In contrast, 20.2 % of the respondents stated that it is not clear to them. As one of the respondents in this category elaborates; “I could need a brush up and probably I am not fully aware of when (to use it). So far I have not been in a situation where I would think that maybe I should use the complaint system.” (Respondent, Survey: 33)

Similarly, 77.4 % of the respondents indicate that they have enough information about the CHS, whereas 20.2 % of the respondents do not feel they have enough information.

These observations indicate that DanChurchAid employees in general are aware of the CHS and that the majority of the respondents know when to make use of the CHS and feel they have adequate information about the system.

Despite the general feeling among the respondents of being well aware about the CHS, there are still some employees who are in need of more information. Along these lines, 34.6 % of the respondents feel they need to receive more training in the DanChurchAid complaint handling system. Some of the respondents state that they need training because they lack information about the CHS. Others emphasize the need for occasional training to refresh their knowledge of the system. As a respondent puts it; “DanChurchAid being a ‘Humanitarian Accountability Partnership’ (HAP) certified organisation - we must try to improve the way we deal with the complaints. So I am interested in receiving more training on the CHS” (Respondent, survey: 34)

In the following we will respond to the recommendations that were listed in the internal review.

**Recommendations: DanChurchAid’s handling of sensitive complaints**

- Internal guidelines/complaint procedures should be made, which include the roles of all DanChurchAid employees involved in the handling of sensitive cases and provides an overview of the complaint handling process. However, no two cases are the same, so the guidelines should not be specific or understood as an internal checklist. The intention is to establish a process description or guidance document that can provide DanChurchAid employees with an overview of the process. This will secure a common understanding of the roles, responsibilities and tasks related to the handling of sensitive cases. Currently, the only internal guideline/tool being used is

---

\(^3\) Survey made among all DCA employees. The survey was distributed electronically to all DCA employees via email. 107 DCA employees participated in the survey, which constitutes approx. 35.7% of the total number of employees in DCA.
the Terms of Reference (ToR) for the investigation, and this is seen as a very supportive and helpful tool in the investigation of sensitive cases.

**Follow-up:** As follow-up on this recommendation we have established a process description which is published on our website.

- DanChurchAid employees involved in the handling of cases should receive training in the handling of sensitive cases. The training could also be a method to secure knowledge sharing on the handling of sensitive cases.

**Follow-up:** This recommendation is specifically about training of the employees handling corruption cases in partner organisations. We agree to the recommendation and will follow up with training of selected key personnel.

- Develop a tool kit in order to support the investigators and to secure an established process for the investigations of sensitive cases. This could include: *How to* investigate in a confidential and objective manner (methodology and ethic considerations), interview guides and good advice. In doing so it is important not to create a standard checklist for all investigations, since the individual case must be understood in its own context.

**Follow-up:** A similar recommendation was given in the HAP recertification report, and we will work on this recommendation. With sensitive personnel cases we used to apply the recommendations and methodologies recommended by Building Safer Organisations (under HAP) which can be read in Building Safer Organisations Guidelines (http://www.hapinternational.org/pool/files/bso-guidelines.pdf). We will continue to develop a tool kit for DanChurchAid based on the recommendations from Building Safer Organisations.

- For the DanChurchAid employees who are often involved in the handling of sensitive cases (*e.g.* the DCA employees supporting the investigation process from headquarters) there is a need to include the handling of sensitive cases in their job descriptions. This will ensure an organisational recognition of the time and resources spent on the handling of sensitive cases, which in turn will match the organisational priority of handling the sensitive cases in an effective and accountable manner.

**Follow-up:** A few employees have already included the handling of sensitive complaints in their job description; but we will currently consider if more employees should have their job description updated. However, we want to keep some flexibility, so that we can select the most suitable employee/s as investigator/s, whether it is stated in their job description or not.
• An evaluation/review component should be integrated in the handling of sensitive cases, *e.g.* to organise a Skype meeting/conference call with the DanChurchAid employee involved when a case is concluded. This should also be included in the internal guideline of the handling process. This will ensure knowledge sharing, identification of best practices and the continued improvement of the CHS internally in the DanChurchAid.

**Follow-up:** Regarding sensitive cases the ToR states clearly that Lessons Learned must be included before concluding the case. As to the sensitive personnel cases it is often not possible to hold a meeting/conference with all employees who, one way or the other, have been involved in the case. However, we will pay more attention to the follow-up of sensitive partner cases in relation to the employees involved.

• Increase the awareness of the CHS among DanChurchAid employees. This could be done by including presentations of the CHS in the introduction material and training to all new employees. A tool kit on the CHS could be developed that targets the regional offices and enables them to conduct the training (standard power point presentation, e-learning material etc.). This could be made available on the intranet.

**Follow-up:** We agree to the recommendation, which was also stated in the Danida evaluation of DanChurchAid’s work in Sudan. We currently introduce the CHS to the employees both at HQ and new employees at the Regional Offices. It takes place at the introduction meetings and at the June course for new international employees. In addition we have organised workshops at all Regional Offices except in Sudan, Honduras (planned for autumn 2012) and Kyrgyzstan. We have several power point presentations about HAP and the CHS on the intranet, and we will constantly update and improve this material and ensure that all new employees are introduced thoroughly to the CHS.

**Recommendation: DanChurchAid’s handling of operational complaints**

• Develop internal guidelines for the handling of operational complaints in DanChurchAid. The guidelines should include:

  a) A clear definition of what constitutes an operational complaint.

**Follow-up:** The original point of departure for the operational complaints was that the complainants themselves had to assess whether they would lodge the case in the CHS or opt for a different solution, *i.e.* that the persons in question had to decide whether they would define a case as a complaint or not. According to National Department, which receives the bulk of the operational complaints in the central CHS, this system is popular, so we want to continue this way.
Alternatively, the system may seem to be bureaucratic and much less flexible than the present one.

b) Clarifications about in which situations the DanChurchAid employees should refer a case to the CHS, when a case was not initially reported to DanChurchAid through the CHS, but through other channels in the organisation.

**Follow-up:** It may sometimes be reasonable to transfer serious cases to the CHS. It actually happens in practice, as some employees in National Department have transferred cases that became more serious. We want to underline, however, that the individual employee makes the decision or informs the complainant about the option in order to keep the system as flexible as possible and less bureaucratic.

- DanChurchAid employees who through their daily work frequently deal with general enquiries, comments and complaints should receive training in the handling of operational complaints. This training should also address the cases which DanChurchAid employees should refer to the CHS.

**Follow-up:** Only once did we experience a problem with a reply from National Department, because the case was not thoroughly investigated before replying. The matter was followed up. All other employees answered correctly. Therefore we do not find that more training is needed; however, we follow the situation closely.

- Develop an online feedback function on the Internet where people can give feedback to DanChurchAid. This feedback function could be used to collect feedback and comments from external stakeholders.

**Follow-up:** Through the website there are many possibilities of giving feedback to DanChurchAid, but we will consider the recommendation. The present complaint form is now electronic, and that makes it easier to lodge a complaint in the CHS.

- A suggestion raised by a DCA employee: Establish an internal complaint desk. More DanChurchAid employees should be able to access the complaint desk. The idea of this complaint desk is to ensure that complaints are addressed in a timely manner, and do not disappear in the system/an inbox *e.g.* due to absence.

**Follow-up:** We have not experienced big problems with late or no answers, so the recommendation will not be followed.
Part 2: Specific complaints lodged in DanChurchAid’s Complaints Handling System in Copenhagen

From 1 January 2011 to 31 December 2011

Corruption cases in partner organisations
Summary made by Maja B. Gram

2011.C01 Contents of complaint: DanChurchAid received a corruption complaint against a director of a partner organisation in Africa. He was accused of using the organisation’s car for private purposes, paying private purchases with the organisation’s funds and stealing of construction materials.

What did we do: The case was investigated in cooperation with the board of directors of the organisation. It was not possible to prove any corruption. By the end of 2011 the cooperation with the partner organisation ended, as the project was finished.

Lessons Learned: It is important to make systematic follow-up on our projects, so that suspicion of corruption can be proved or the opposite.

Follow-up on 2010 corruption cases:

2010.C05 Contents of complaint: An auditor’s report revealed insufficient financial management of a partner organisation in Latin America supported by DanChurchAid. Consequently a 100% audit was carried out.

What did we do: This 100% audit confirmed the seriousness of the case. The fraud resulted in DanChurchAid’s termination of cooperation with the partner, and together with other (former) donors DanChurchAid took the partner to court.

Follow-up: The conclusion is that all project expenditure related to DanChurchAid/Danida supported activities has been verified. The partner cannot reimburse an unspent balance by the end of 2009 of DKK 20,251.06 (USD 3,720.45). The organisation has been dissolved and the amount is considered lost. Based on the local auditor’s comments in the financial accounts we believe that the unspent funds have been swindled out.

2010.C07 Contents of complaint: It was revealed that a partner in Zimbabwe supported by DanChurchAid used a false branch of a big international auditing company.

What did we do: The auditor’s report is being scrutinised to find out if fraud has taken place; another auditing firm has been hired to revise the activities and the financial capacity of the partner organisation. DanChurchAid has currently monitored the partner and the project. In connection with the case DanChurchAid has
established a close cooperation with the board of the partner organisation who was as surprised at the case as was DanChurchAid.

**Follow-up:** The partner organisation has more or less been dissolved after the close investigation was initiated. DanChurchAid expects a loss after the final audit. Together with other ACT Alliance organisations we are in the process of minimising the loss by taking over the material assets we supported in the project.

**Follow-up on 2009 corruption cases:**

1.15  **Contents of complaint:** A partner organisation in Africa was suspected of misuse of funds. A closer assessment showed that the problem was mainly within the management and the administrative systems.

**What did we do:** We had a dialogue with the partner organisation on how to tackle the suspicion and discussed management problems. Some key persons in the management were changed. We decided to carry out an extraordinary audit, which is still ongoing. Next step will be based on the conclusions of the audit. Our back-donor Danida has been notified.

**Follow-up:** The external audit showed that in connection with construction of a seed bank over-payment had taken place and a radio had been given away. The auditor could conclude that DKK 110,721 had been misused. DanChurchAid has covered the loss from own funds and has total confidence in the new management of the organisation. The new management has been cooperative during the investigation process. DanChurchAid is still supporting the organisation which in our opinion is trustworthy and doing very important work.

**Lessons Learned:** Cases like this are very regrettable. During the investigation we initiated a number of organisational changes in cooperation with the partner, and this has strengthened the organisation.

1.17  **Contents of complaint:** DanChurchAid employees reacted to irregularities in the documentation and reporting from a partner organisation in eastern Africa. Suspicion of use of project funds for private purposes and disregard of procurement procedures led to further investigation.

**What did we do:** We informed our back-donors about the case and began an investigation of the partner. An external audit was carried out. DanChurchAid’s employees were involved in the preliminary investigation. The investigation and the audit revealed irregularities at an amount of DKK 157,025 during 2008-2009. The irregularities included unlawful payments to an employee, undocumented or unjustified expenditure, suspicion of conflict of interest in connection with expenditure, insufficient administration and control as well as other expenditure for which the auditor had made reservations. The management of the organisation has now been changed, and DanChurchAid is in the process of rehabilitating the partner.
DanChurchAid covers the loss from own funds as it is our assessment that the partner possesses no assets and that going to court would be more costly (not least time-wise) than the lost amount. However, we will demand reimbursement of DKK 10,220.50 that an employee transferred to himself illegally.

**Lessons Learned:** Trust is an important aspect in the way DanChurchAid works, but there is also a need for control in the form of a.o. project visits, during which the activities are verified and followed. It is important that DanChurchAid employees have a say regarding which areas and partners to be visited in connection with a monitoring visit. In the country in question DanChurchAid has specifically decided to reduce the deadline for delivery of the first draft of the monitoring report. Any well-founded suspicion of corruption must immediately be reported to the immediate leader and a plan of action prepared. It is crucial to involve and secure the cooperation of the board of directors in the local partner organisation. In case of corruption the backing of the board is important, as they can make decisions (e.g. about firing of employees) and support the ongoing investigations.

Fundraising in Denmark
Summary made by Gitte Krogh

2011.F01 **Contents of complaint:** A women complained about the way a phoner talked to her. She wanted to donate a monthly contribution, but she did not want to inform her ID number and bank account number over the phone. The phoner would not accept that, and tried over and over again to persuade her. The conversation became long and irritating in a condescending and disrespectful tone. The women will continue her support, but would like DCA to instruct our phoners to show a little more respect.

**What did we do:** We regretted her bad experience and explained that of course it is not our intention to make people we contact feel harassed or treated in a condescending way. We promised to contact the call-centre working for DanChurchAid. All conversations are recorded, and if the phoner in question did not follow our guidelines, it will be corrected. We thanked her for her continued support.

**Lessons Learned:** Contact to the call-centre followed the usual guidelines.

2011.F02 **Contents of complaint:** A women who had supported DanChurchAid for many years lodged a complaint, that for a couple of years she had not received an annual financial statement from DanChurchAid. The latest one from 2006 showed that she contributed both to demining in Eritrea and to DanChurchAid’s general work.

**What did we do:** We explained that normally we only send annual statements on request. We never did it automatically, as it is quite costly. However, every year the
donations are reported automatically to the tax authorities. If she insisted we would send her the annual statements. We also informed her that both her contributions were used for DanChurchAid’s general work, but if she wanted we could change that to humanitarian mine action in Africa. The woman said that she did not want the statements; she only wanted to ensure that her donations went to DanChurchAid. She did not want to earmark her contribution to demining in Africa, but trusted us to spend the money where it was most needed.

Lessons Learned: This case shows that a reasonable and forthcoming reply can solve many problems. Therefore, it is important that everybody in the organisation always has a good dialogue with our donors.

2011.F03 Contents of complaint: A man complained because he saw how a facer followed two young men for a long time even if they politely rejected her. He did not interfere, but was so provoked by the behaviour of the facer that he stopped donating to DanChurchAid.

What did we do: We explained that recruiting of new members in the streets is a big help in our work with the poorest in the world. A large number of people choose to use this offer, and in 2010 13,000 Danes became members through street recruitment. At the same time we are aware that the method is confrontational and even provoking to some. Therefore, we have made ethical guidelines which our employees must follow. We are very keen on educating and ensuring that our employees follow certain guidelines, so that the people we meet in the street get a good experience. In the situation mentioned above the facer violated the ethical guidelines which we regretted. In the office in question, the ethical guidelines have been reiterated and discussed again in order to prevent similar situations in future.

Lessons Learned: We constantly train the facers in the ethical guidelines and this work continues.

2011.F04 Contents of complaint: A woman complained because a collector from the Parish Collection had entered her home. She was very shocked to find a stranger in her home. She did not want this to happen again and asked us to inform all collectors that they are not allowed to enter into peoples’ homes when the door is not answered.

What did we do: We apologized for the unpleasant incident and explained that all collectors receive written guidelines before beginning their route. Of course it is not good behaviour to open doors and to enter a home without permission. We will, therefore, consider writing explicitly in the guidelines that privacy must be respected and that the collectors are not allowed to enter peoples’ homes.

Lessons Learned: Later it was decided that there was no need to specify in the guidelines that the collectors should not enter into peoples’ homes.
2011.F05 **Contents of complaint:** A women complained that in a pedestrian street she was contacted by a facer who she found very aggressive and churlish. In general, she felt attacked by all facers when walking in the pedestrian street and that they often followed her, even if she clearly signalled that she was not interested in any contact. The same thing happened that day, and after she had rejected the facer and continued her stroll, the facer shouted after her that he was from DANCHURCHAID. Thus she got the name of the organisation which she was very sure not to support, as she felt harassed by being exposed and shouted at in the street. Consequently, she also said no to donate an amount during the Parish Collection.

**What did we do:** We thanked her for taking the time to inform us about the incident, so that we could improve our work. We explained that street recruitment is the campaign that gives the largest number of new members to DanChurchAid; therefore, it is a very important campaign. We also want to ensure – in fact it is our duty - that people have a good experience in the city environment whether they support us or not. Therefore we apologized for the bad experience she had in the street. Then we explained about our training modules and ethical guidelines for street recruitment and promised her that we would focus even more on the ethical guidelines in the city in question in order to prevent similar incidents in future.

**Lessons Learned:** We constantly train the facers in the ethical guidelines and this work continues.

2011.F06 **Contents of complaint:** A married couple who had participated in the Parish Collection for several years complained about the 2011 collection. They thought that the giro was in bad taste ("you are a hero") as if it was an “X Factor” competition. They refused to distribute the giros and were generally sceptical about the project. They found DanChurchAid’s slogan “We believe in life before death” rather ordinary and ‘fancy’, as it is obviously not a showdown with the Christian preaching of an eternal life. The information about 98 million less starving people also seemed unclear: Why? Because they are dead? Because of a better harvest? Due to ACT’s fundraising? Where did we get these figures? In their opinion the collectors were not able to explain the meaning behind this. Further they found that the collection boxes looked like black coffins and that they cut into the hands as they got heavier. It was not because of DanChurchAid that the collection was not an entirely bad experience – they really felt like workers in the do-good-business – but luckily people were kind and the weather was good.

**What did we do:** First of all we thanked them for participating in the Parish Collection. We explained “the hero theme” and that the campaign had been tested in different fora and adjusted according to the feedback. We regretted that the couple resented the campaign, but that we had not received other similar reactions. We agreed that the information leaflet should have mentioned the UN Report on the so-called 2015 Millennium Development Goals as the source of the 98 million less starving people. We did not agree to the association to black coffins, but we were
pleased that the boxes differed from other organisations’ boxes and that it could be re-used. We agreed that the handle can cut into the hand when the box is full. The handle is designed so that the boxes can be stacked and thus take up less room when being distributed and stored between the collections. Finally we expressed our regret for their complaint, but we also noted that in spite of it all they had had a good collection.

**Lessons Learned:** As there have been no similar comments, the complaint has not resulted in internal consequences.

**2011.F07 Contents of complaint:** A man complained about a collector in the Parish Collection who had been very insisting. As the family was not at home, the collector had left a brochure on the steps to the house and had dropped another through an open bathroom window. The complainant said that because of this “carpet bombing” he would not make use of the giro.

**What did we do:** We agreed to the complaint and apologized that the enthusiasm had got the better part of the collector. We also explained that the collector’s guidelines informs the collector that the brochure must be put into the mailbox or pushed through the letterbox and not left visible, because this will indicate that nobody is at home.

**Lessons Learned:** The guidelines for collection are clear concerning delivery of the brochure, so there was no further follow-up on the matter.

**2011.F08 Contents of complaint:** A woman complained that she had been contacted repeatedly and begged to increase her contribution to DanChurchAid or to participate as collector in the Parish Collection. She had been a donor for a number of years with a fixed amount and did not want to receive more phone calls.

**What did we do:** We explained that the reason for contacting current donors is that approx. every fourth donor actually increases their monthly contribution. We regretted that she had had a negative experience and noted in our database that she did not want to be contacted again.

**Lessons Learned:** There would be no further follow-up.

**2011.F09 Contents of complaint:** A woman complained that she had been contacted by DanChurchAid time and again. When she agreed to donate a fixed amount it was on the condition that she did not receive mails, post and phone calls. She had called and emailed to stop the contacts, and now she was so tired of it all, that she wanted to stop her donations.

**What did we do:** According to her wish we deleted her from our lists and regretted that she had been contacted against her wish. It is not our usual procedure.
Normally, when a donor informs us on the phone that he/she does not want to be contacted again for more donations, to become a collector or something else, it will be noted in our database. In her complaint she wrote that she had tried several times to draw our attention to the fact that she did not want to be contacted. As it had not been registered in our database we asked her to help us with more specific information so that we could follow up on the matter in our system or with an employee.

**Lessons Learned:** Our systems are designed to handle situations when donors do not want further contact. Therefore, it is very important that the database is updated with this information, so that we prevent situations where donors want to withdraw their membership.

2011.F10  
**Contents of complaint:** A man complained that he received newsletters and was contacted on the telephone after he had participated in a fundraising. He wanted us to stop contacting him.

**What did we do:** We apologized that he had had a bad experience with our telephone campaign and noted in our database that he did not want further contact.

**Lessons Learned:** There would be no further follow-up.

2011.F11  
**Contents of complaint:** A woman complained that the back of the “Magazine” showed a photo of two rabbits in connection with the “Give-a-goat or –rabbit” campaign. She said that a rabbit is a pet and became so angry that she did not want to continue her support to an organisation that is so insensitive.

**What did we do:** We thanked for the complaint and that she had spent time to write to us in connection with her resignation. We explained that both animals are part of our “Give-a-goat” campaign that provides long-term development aid to thousands of poor families every year. The campaign has 22 different presents at its disposal, from goats to chicken and also rabbits. For many families rabbits provide crucial nutrition and a possibility to earn a little money, e.g. from selling some of them.

**Lessons Learned:** We have not received similar complaints about giving rabbits, so this complaint will not affect the campaign.

2011.F12  
**Contents of complaint:** A man who had donated money to several DanChurchAid fundraisings complained that it seems to be general practice to use these donations as point of departure for systematic persuasion of the donor. He had received our Magazine and had also been contacted on the telephone and by e-mail. He did not want any contacts whatsoever in the future. He was perfectly able to decide whether he wanted to support our projects again.

**What did we do:** We saw to it that he no longer receives material from DanChurchAid and apologized for exceeding his limits in relation to the number of
contacts. The background is that we experience that many people like to be updated on our work and receive information about how they can support our work again. Of course, some people do not want it, and we respect that completely. Therefore, it is possible to say no thanks to future contacts in a ticking off box when donating through our website. We promised to check if this box is clearly visible on our website.

**Lessons learned:** National Department decided earlier to remove this box on our website, as it makes communication with our donors difficult. It actually turned out that DanChurchAid is one of the very few organisations that had such a ticking off box. A donor can always ask not to be contacted again, both when we call and in all mails we send out. Besides, it is very important that the database is updated regarding donors’ wish to be contacted or not, in order to prevent people from asking to be deleted from our system.

2011.F13 **Contents of complaint:** A man complained that his donation had not been correctly reported to the tax authorities.

**What did we do:** It turned out that we had reported the correct amount, and that the error was with the tax authorities. We informed the complainant accordingly.

**Lessons learned:** As it was not an error on our part, the complaint has had no further consequences.

2011.F14 **Contents of complaint:** A woman complained that she had been registered for a monthly donation of DKK 100 and not as agreed on the telephone a single donation at that amount. She asked to be deleted from our system.

**What did we do:** We thanked her for her complaint and apologized for the misunderstanding of the agreement. We cancelled the agreement and promised to follow-up internally in order to prevent similar misunderstandings in future.

**Lessons learned:** There would be no further follow-up.

2011.F15 **Contents of complaint:** A woman complained that her 74-year old mother had been contacted on the telephone and asked if she would like to change her six-monthly contribution into a monthly contribution, as it would be a great help for DanChurchAid. Then she was asked to give her account number on the telephone, but here the conversation stopped, as the mother hung up. The complainant did not find it serious to call an elderly lady and ask if her contribution could be changed from a six-monthly to a monthly contribution.

**What did we do:** We regretted that our call did not seem serious, but the intention was to offer to make a fixed monthly contribution through the Payment Service. Many people prefer this automatic transfer of money so that they do not have to use
giro or Net bank. It is our experience that many people actually want to donate more than they already to, but often they do not take action to make the change. That is why we contact our donors. We thanked for the six-monthly contribution and hoped that the mother would continue her support. Finally, we noted in our database that the donor should not be contacted again.

**Lessons learned:** There would be no further follow-up.

2011.F16  
**Contents of complaint:** A Collection Coordinator complained that a link in a mail to him did not work. As Collection Organiser he was disappointed that such a detail did not work perfectly. He also wondered whether DanChurchAid has a complaint address at all, and if we receive so many complaints, something must be fundamentally wrong. He had opted to support another organisation, whose system worked fast and safely.

**What did we do:** We admitted that such technical details must be in order, and usually they are. We always test everything before large distributions, but sometimes errors happen anyway. In this case the web format had been tested by our IT staff and in the Collection group, and we could see that money was transferred via the format, so everything should be ok. Later we received mails and calls from donors who had experienced problems, and at the same time we could see that other donors did not have problems. Our IT staff worked on the problem and solved it. Regarding our complaint system we can inform you that we do not receive many complaints, but the system has been designed to accommodate donors, collectors, collection coordinators and companies if they are not satisfied and want to complain, but do not know who to write to.

**Lessons learned:** We have general procedures for testing before large distributions, so there would be no further follow-up.

2011.F17  
**Contents of complaint:** Several persons complained that the payment module on the new website did not work.

**What did we do:** We regretted the error and corrected it on our website, see also complaint 2011.F16.

2011.F18  
**Contents of complaint:** A man complained that his daughter, a minor, had registered as a member through a facer. Later he withdrew her membership and suggested that maybe we could have a passive membership for minors.

**What did we do:** We regretted that an agreement had been made with a minor. Our guidelines concerning recruitment of members are very clear, and they do not allow our employees to make agreements with persons under the age of 18. We inform our employees currently about the guidelines for street recruitment, and our employees are also informed that it is not allowed to make such agreements. In this
case a mistake was made, and consequently we have informed the office in question about the complaint and impressed the guidelines in order to prevent similar cases in future. We do not consider membership for minors a possibility, but thanked him for his idea.

**Lessons learned:** The guidelines for recruitment of minors are clear, but a mistake was made in this case. There was no need for further follow-up.

2011.F19

**Contents of complaint:** A woman complained that her old mother had been contacted by a phoner from DanChurchAid. The mother was asked to inform her personal ID number and was quite confused about the call. Shortly afterwards the phoner calls again and the woman answers on behalf of her mother. She asked not to be contacted again, and when the phoner asked why she should not call, the complainant replied that the phoner should not ask that question. Then the phoner slammed the handset. The woman was a loyal supporter of DanChurchAid, but she did not like the method used when phoning. Maybe the phoner should consider whether to call again, when an ID number or account number is not given. At the same time the woman did not feel obliged to inform why they did not want to support.

**What did we do:** We explained the background for our telephone campaigns as a means of fundraising, and that for many people this campaign was an easy way to act when they wanted to donate to the poorest in the world. It happens sometimes that we contact people who for one reason or the other are not able to grasp the agreement they are going to make with our phoner. Our employees have been instructed to end this kind of conversations, but sometimes it can be difficult to hear through the telephone; therefore, a person can unsubscribe his/her contribution any time either by contacting DanChurchAid or through his/her own bank. We noticed that the phoner hung up without ending the conversation in a decent manner, and we regretted it very much. On the other hand we found it reasonable that the phoner asked why the mother did not want to contribute, because we often experience that there are unanswered questions regarding information about the bank account. We asked for the mother’s telephone number so that we could follow up with the phoner in question and ensure that the person takes care to end the conversations in a polite manner. The woman thanked us for our extensive answer and sent us her mother’s telephone number.

**Lessons Learned:** The case was followed up with the employee in question.

2011.F20

**Contents of complaint:** A woman complained that she had been contacted several times both when she was a donor and also after she had stopped donating. She could not afford to support DanChurchAid anymore and was irritated that obviously she could not be deleted from our system; also, that she could not just support without DanChurchAid phoning her regularly. She said that it was easy for her to support us again if she so wished.
What did we do: We explained that usually we call our donors shortly after making a donor agreement to thank them for supporting us. We do this to confirm to the donors that their decision to support us is very important and also to give them an opportunity to ask questions. When you have been a donor for some time, we call again and thank you and give you an opportunity to increase your contribution. We instruct our phoners very carefully that the most important is to say thank you and that the donor should never feel pressurised or that we are ungrateful. When a donor unsubscribes his/her payment service it is normal procedure that we call the donor; among others to learn if we have done something “wrong”, but also to thank the donor for the support so far and to give the donor a possibility to reconsider his/her decision to unsubscribe. It is our impression, however, that most donors are pleased to hear from us. We apologized for her bad experience. We promised to look at the procedure again and find out how we can avoid that the donors are left with a bad experience. We also promised the woman that we would not contact her again.

Lessons learned: As mentioned above the procedure has been re-assessed. We maintain the procedure, as almost every fourth person we approach actually increases their contribution through the phone call.

Contents of complaint: A woman complained that her father still received the DanChurchAid Magazine and giro addressed to her deceased mother. In addition her father had been contacted several times on the phone, even if he had explained that his wife had passed away. The woman asked to delete her mother’s membership.

What did we do: The woman’s membership was deleted from our database, and we ensured that her phone number was not in the call-queue, so that her husband would not be contacted again. We apologized to the woman.

Lessons learned: Generally, we change the donors’ status in the database to “dead” as soon as we are informed by the spouse or when the payment service stops. Further, we carry out an “address wash” every third month based on information from the National Register. When the status in the database is changed, the persons will automatically be deleted from future contacts in our CRM system.

Contents of complaint: A man complained that he had not been unsubscribed as “life saver”. He had become a member through a facer, but shortly afterwards regretted his membership. Although he had e-mailed us, money had nevertheless been drawn from his account.

What did we do: We regretted that due to holidays there had been no proper follow-up on his resignation, and we cancelled his subscription. We also offered to reimburse the amount drawn from his account.

Lessons Learned: There was no further follow-up.
Contents of complaint: A woman complained that her daughter had been contacted by a facer in the street and had made an agreement, even if the daughter had no money to support DanChurchAid now. The facer had told the daughter that she could consider her decision until the autumn, but the daughter had immediately been registered in the payment service. As a parent she found that it was not reasonable to “cheat” young people like that. The woman wanted the daughter to be deleted as donor.

What did we do: We deleted immediately the daughter from our system and explained that it is important for DanChurchAid that we do not receive money from persons who do not want to donate. It turned out that the agreement should not come into force until the autumn as promised by the facer. However, we regretted the inconvenience she and the daughter had had in this case.

Lessons Learned: There was no need for further follow-up.

Contents of complaint (first complaint about buy aid): A woman complained that her father-in-law, who wanted to donate an amount to the hungry in Africa, has been contacted on the telephone by buy aid and agreed to donate DKK 1,000, which is quite a big amount for a pensioner. Later a parcel arrived with a lot of things he did not need – and at exorbitant prices. It turned out that from the DKK 1,000 paid by the father-in-law, only DKK 69.90 was for relief aid. The complainant calls this a scam. They returned the parcel, and the woman thinks that even after paying the return postage, the amount her father-in-law donated to relief aid through buy aid is indecently low. The woman said that in future they would consider donating to other relief organisations than DanChurchAid, which they had supported for many years. She did not understand that a relief organisation can support such a “money machine”. For every one million DKK DanChurchAid receives from buy aid, they have made a huge profit, the complainant said. Finally the woman declined any further contact to her father-in-law.

What did we do: We regretted that her father-in-law had had a bad experience with our partner buy aid. Basically, we are satisfied with our agreement with buy aid. We receive 10% of buy aid’s sale of goods to corporations, and last year the total donation amounted to DKK 1.2 million; such an amount we could not have raised ourselves, because it comes from sale of goods to corporations – a sale we cannot make. We regret very much that buy aid called her father-in-law, as they should only contact companies and businesses. It is a mistake and we have informed buy aid about it, so we hope it will not happen again.

Lessons Learned: Buy aid knows that they are only allowed to use updated phone lists. However, they realise that there may be some outdated numbers on the lists that may result in calls to private persons. Those numbers will be deleted when buy aid comes across them.
Contents of complaint: A man complained that over the last two years the same face-to-face person has approached him several times a month to ask him to support DanChurchAid. He thinks it is ok that we make fundraising, but our facers do not accept a ‘NO’ and are consciously chasing people. The same facer had admitted to him that he would not give up until he signed an agreement. The man called this harassment and wanted it to stop and asked us to reprimand the facer.

What did we do: We explained the ethical guidelines for the face-to-face campaign which should ensure that the persons we contact in the street have a good and positive experience with DanChurchAid’s facers. Our facers should neither “chase” nor harass people in the street. We regretted his bad experience. Further we talked with the responsible coordinator about the case and we would also follow up with the group in question.

Lessons Learned: We followed up on the matter in relation to the group.

Contents of complaint (second complaint about buy aid): A company contacted DanChurchAid by telephone and complained about a phoner from buy aid. They said that the phoner had introduced himself as a DanChurchAid employee, and they were angry to learn how small a percentage DanChurchAid received. That information was given quite late in the conversation with buy aid.

What did we do: We explained our cooperation with buy aid (see complaint no. 2011.F24) and promised to impress on buy aid that their phoners shall introduce themselves as being from buy aid and not from DanChurchAid.

Lessons Learned: As a follow-up we impressed on buy aid that their phoners shall introduce themselves as being from buy aid and shall give 100% correct information about the cooperation with DanChurchAid.

Contents of complaint (third complaint about buy aid): A woman called and explained that a consultant from buy aid had called her and told that “in cooperation with DanChurchAid” they had developed some relief packages. She got suspicious, because she found that many people abuse the names of the relief organisations. Therefore, she wanted to call our attention to the above, in case buy aid made a scam and made a huge profit to themselves. The following day the woman called again as she realised that we actually cooperated with buy aid. She had now written on our Facebook wall that it irritated her very much that DanChurchAid let buy aid abuse its name to make money. As DanChurchAid only received 10% she did not find it worth the trouble and that it damaged our image to cooperate with those conmen.

What did we do: We explained our cooperation with buy aid to her. Basically we are satisfied with our agreement with buy aid. We receive 10% of buy aid’s sale of specific goods to corporations, money we could not have earned ourselves, as it originates from sales we have no possibility to make.
Lessons Learned: We realize that we may receive more calls/complaints about our cooperation with buy aid in times with critical media coverage. Buy aid is informed about all cases.

2011.F28 Contents of complaint: A man complained that he had tried several times to send money to relief aid, both via the giro in the Magazine and later through bank transfer. He suggested that we simplify our website.

What did we do: We regretted that at the latest number of the Magazine an error occurred in the number of the giro. We have also experienced that some donors received an “error” feedback, when they wrote their post code in the “donate now” box on our website. This error has been corrected.

Lessons Learned: We will intensify the control of the OCR line (the number at the bottom of the giro) before all mailings.

2011.F29 Contents of complaint (fourth complaint about buy aid): A man complained that an employee in an institution (under the municipality?) had been persuaded to buy products from buy aid at an amount of DKK 900. The employee informed buy aid that the institution could under no circumstances support DanChurchAid’s work. The employee was at no time informed that buy aid only gives 10% of the profit to DanChurchAid from the sale of products. For the DKK 900 the complainant received a big bag of candies and some ball point pens, the real value of which probably was around DKK 90. The complainant found it very critical and not serious that organisations and individuals are lured to give money to buy aid. He asked if DanChurchAid has investigated at all what our partner sells in the name of the organisation, and above all the price? The complainant could simply not understand that we would continue the cooperation with buy aid, which he considered an unscrupulous enterprise abusing caring persons’ naivety. The complainant had supported DanChurchAid previously, but would not continue his support after this experience, and he would also share it with friends and acquaintances, so that DanChurchAid would lose more of its backing.

What did we do: We regretted the bad experience with buy aid and explained about our agreement with buy aid. We receive 10% of the profit from the sale of specific products – and basically we are satisfied with the cooperation. We forwarded the complaint to buy aid.

Lessons Learned: This complaint together with previous complaints resulted in an internal meeting in our Supporter Relation group about the cooperation with buy aid. The assessment was that the many complaints received over the past months have been about goods from buy aid from which we normally do not receive any profit. Usually, DanChurchAid received profit from sale of water, coffee and
chocolate. However, during the summer we have also received profit from the sale of other buy aid goods, such as pens, post its etc. This is due to the fact that during the summer of 2011 buy aid was only cooperating with DanChurchAid. In September 2011 buy aid began cooperation with another organisation, and after that DanChurchAid only receives the profit from water, coffee and chocolate. We will currently monitor the number of complaints after returning to “the usual” goods.

2011.F30  
**Contents of complaint:** A woman complained that one month after she had stopped donating to DanChurchAid, a phoner had called her and had ended the conversation by hanging up without saying good bye.

**What did we do:** We regretted the bad experience she had had during the call. Obviously, the way the conversation ended did not live up to our requirements of politeness and professionalism. The employee in question has been told that it is not acceptable to handle conversations in such a manner.

**Lessons Learned:** Already now we can monitor conversations, so that similar situations will not be repeated. There was no further follow-up.

2011.F31  
**Contents of complaint:** A woman told us that when she agreed to give a fixed amount through payment service she declined to receive letters from DanChurchAid. She did not mind receiving e-mails. She complained that she had now received a Christmas giro, and although it was a small thing she was nevertheless irritated.

**What did we do:** We registered in our system that the woman did not want to receive letters and apologized that it was not done earlier.

**Lessons Learned:** It is important that the employees remember to currently update our systems, so that the donors do not become so irritated that they withdraw their membership.

2011.F32  
**Contents of complaint (fifth complaint about buy aid):** A man complained that his school in Greenland had been contacted by buy aid. He wanted us to inform buy aid, that the school was not interested in more calls, no matter which “offers” buy aid could deliver. He found the procedure and the constant calls distasteful, and he regretted very much that DanChurchAid used such a partner, whose activities and procedures must be considered absolutely unacceptable. Han referred to the poverty in his town, and in spite of this the population was able to contribute at fundraisings – the latest one to the Horn of Africa. Naturally, he supported such initiatives, and his school opened its doors for non-profit arrangements of this kind. This practice would now be reconsidered on the background of buy aid’s completely unacceptable behaviour.
What did we do: We regretted that he had a bad experience with buy aid regarding the repeated calls and informed buy aid about the case. Buy aid then apologized to the man and deleted his phone number in order to prevent more contact.

Lessons Learned: There was no further follow-up.

2011.F33 Contents of complaint: A woman who had donated a one-time amount of DKK 150 to Africa complained that this amount would never reach the poor, but had been used for administration many times over. After her donation, she had been contacted 4-5 times on the telephone and once by e-mail. At the first call she had made it clear that she donated an amount when she chose to do so and not when we begged for money. She did not want to be contacted again.

What did we do: We regretted that she had had a bad experience and noted in the database that she should not be contacted in future. We also explained that it is normal practice to accept that donors do not want further contact.

Lessons Learned: There was no further follow-up.

Organisational matters
Summary made by Gitte Krogh

2010.O01 Contents of complaint: Two volunteers in a second-hand shop complained about a DanChurchAid employee who communicated with the volunteers in a way that they rather felt like criminals.

What did we do: At the meeting in question between the employee and the two volunteers, the employee assessed that the shop had a disproportionately high level of expenditure, and that there were problems with the accounts as stated by an external auditor. Consequently, the employee at the meeting demanded some changes both of the accounting and of the level of expenditure as agreed with the HQ “Second-hand Group”. As a follow-up on the complaint we organised a meeting between the volunteers, the employee and the leader of the second-hand shops. At the meeting it turned out that only one of the volunteers had written/read the complaint. The meeting was held with a view to create a future good cooperation and to resolve the present problems in common. The work is on-going.

Lessons learned: There was no further follow-up.

Sexual harassment or violation of code of conduct
Contents of complaint: A Danish middle manager initiated a consented relationship to an employee who referred directly to the manager in question, which is a violation of § 9 in DanChurchAid’s Code of Conduct:

§ 9. Managers are not allowed to have a sexual relationship with an employee who refers directly or indirectly to them. If the situation should arise it may be decided to transfer one of the persons to another unit or to terminate the contract of the manager involved.

What did we do: The case had disciplinary consequences for the middle manager involved.

Lessons learned: §§ 8 and 9 in the Code of Conduct about the relationship between employees/employees and employees/managers shall prevent any relationship based on unequal power positions which may create conflicts in the organisation due to risk of discrimination of employees. Although the §§ are primarily considered rules for the protection of our international employees, they are also valid in Denmark, even if the relationship is completely voluntary and without the slightest force.

Part 3: Reports from DCA’s Regional Offices in Malawi, Ethiopia, Cambodia, India, Myanmar and the Humanitarian Mine Action Programme in Angola

We have asked the DCA Regional Offices in Malawi, Ethiopia, Cambodia, India, Myanmar and the HMA office in Angola to provide us with information about the progress of the Complaints Handling Systems (CHS) that have been established there.

Report from Malawi
Prepared by Relief Officer Agnes Lumphezi Banda

DCA Malawi is still mainstreaming HAP (Humanitarian Accountability Partnership) in all its various programmes and projects. In 2011, most of the partners had different experience on the Complaints Response Mechanism establishment as follows:

1.0. Humanitarian Projects

1.2. ACT Alliance (SOLDEV & ELDS)
Karonga Floods Response from ACT appeal in 2011 was implemented through ACT Alliance and two partners implemented the project namely ELDS & SOLDEV. DCA had supported ACT Alliance Malawi with DANIDA material Aid to the appeal and had also supported the implementing partners in the compliance to the HAP benchmarks.

Benchmarks: Information and CHM
Project information was produced through brochures and flyers. Both vernacular language and English language were produced. The information carried was: The project name, time frame, implementing and donor partner, distribution points, targeting criteria, amount of funds, number of beneficiaries to benefit, amount of the packages to be provided to the beneficiaries and complaints mechanism contacts. This information was linked with a complaint mechanism desk which was being placed at each and every distribution centre. At each and every distribution centre, this information on the brochures was also being explained to the communities before starting the distribution, and the list of beneficiaries was being posted on the walls of the distribution centre.

Complaints received in some distribution centres were as follows:

- No proper beneficiary selection approach was done by the project community committee; hence in some of the distribution centres it was indicated that some of the beneficiaries were relations to the leaders of the community.
- Some community members had complained that their names were missing from the list while they were targeted and informed by the committee to receive the food rations.

Complaints received at DCA level:

- Distribution of materials delayed hence DCA received a direct complaint from one of the community chiefs over the delay, and the fear of reaching the rainy season without receiving the construction materials. Feedback given: Fuels and inflation crisis in Malawi affecting the price inflation hence suppliers turning down their contracts delayed the process of procurement. Who and how we provided the feedback: the Act Alliance Coordinator communicated to the district assembly and other stakeholders about the challenge and the chief was informed through the same channel of telecommunication.

2.0. Right to Food programme

2.1. CCAP SYND OF LIVINGSTONIA DEVELOPMENT DEPARTMENT (SOLDEV)

Description:
In the quest to demand for socio-economic entitlements, Kamphenda Right to Food Project community organised themselves a HAP committee comprising of 12 members (5 men & 7 women) whose main task was to check transparency and accountability and to lobby for economic development from duty bearers in the project area and at district level. The triangular justice system set at community level had an umbrella committee at the top with several feeder sub-committees at the base. At the top of these sub-committees was a Complaint Mechanism Committee (CMC) responsible for capturing and prioritizing key advocacy issues as agreed upon by community members.

At community level advocacy machinery, prioritized issues were incorporated in the Village Action Plans (VAPs) and later taken to the relevant District stakeholders for redress. Such initiatives yielded good results: health facility at Lusani and Kamphenda (feasibility stage), fence around Vwaza game reserve underway, rehabilitation of several boreholes and
extension services of Chirambo and Jalira, extension staff to overlap Kamphenda section while waiting for full deployment.

**HAP) Complaint Mechanism Committee**
Community members most often fail to address complaints due to lack of a clear complaint mechanism channel and an intimidating atmosphere. Kamphenda project has excelled in this endeavour by clearly defining the channel and training committee members to provide good rapport for complaints handling and feedback.

There were 4 major complaints registered and feedback was given including: under-performance of irrigation schemes due to delayed completion by the contractors; independence of Lusani 1 from combining with Lusani 2 in running project affairs; certain traditional leaders overriding grain bank committee powers, inadequate livestock markets, unequal distribution of project inputs and offer of poor maize prices by private traders. On the irrigation issue, community members spearheaded by the advocacy (HAP) committee mobilised themselves, and after several consultation meetings at community level involving the Village Development Committee, the members of Area Development Committee then the village heads, church leaders and the available government extensions staff in the area (two each from Magalasi and Lusani VDC) they sent four representatives to SOLDEV head office to seek clarification on the delay in completion of the two irrigation sites. They presented a signed petition to the Director who in turn pressurized the contractor to go to work. The contractor appeared on site a week after the community visit. Similarly on detachment of Lusani 1 VDC from Lusani 2, the CMC was approached and they presented the issue to project staff who granted them their wish. Grain bank committee complained to the CMC on certain defaulting village heads who wanted to access food resource bank maize without making full repayment. This conflicted with the grain bank constitution, but the committees could not act for fear of reprimands. This committee has the representations of all stakeholders at community level.

Project staff in consultation with representatives from the paramount chief Chikulamayembe came in to resolve the issue. Committees handling project inputs distribute them based on interest, adherence to group rules, commitment and vulnerability. Failure to meet these qualifications renders one ineligible. Surprisingly some VDCs want project resources to be shared equally disregarding the highlighted project values. This has been a source of inter- and intra-VDC conflicts. In this regard records of active members are kept to inform future selection of the benefiting group. The issue of price manipulation by private traders was referred to DEC, but punitive measures could not come into effect as the legally recognized local government decentralized structure has no councillors responsible for enacting bye-laws to curb such practices. From these instances it is clear that the mechanism for channelling complaints is available and working. However, there is room for improvement, such as introduction of suggestion boxes in strategic points to capture burning issues from the community.

**Success stories**
As development department we appreciate that there is wider understanding of HAP at community level and its SOLDEV staff

Community influencing preplanning of some project activities as a result of their involvements

Lessons learnt
• Effective community participation
• Improved quality programming due to improved and efficient accountability as the communities are able to follow up on what is happening at project level and complain when necessary
• Improved partnership at all levels and trust between communities and SOLDEV projects; this has improved our planning as to where community representation has to be involved at all the stages

Best practice
Full involvement of communities themselves in development as they are the primary users

Challenges
• Slow understanding at all levels; implementation of HAP needs more and focused awareness
• Use of improper means and channel for complaining

2.2. EAGLES RELIEF AND DEVELOPMENT

Background Information: Eagles Relief and Development programme (Eagles) was implementing a food security project in Chikwawa district from January 2009 to December 2011. In order to enhance accountability and participation of right holders (beneficiaries) during the project implementation decision making process, one formal complaint handling mechanism system was established. During the project implementation process beneficiaries have been using this system, and this write up is meant to share some of the complaints raised, how they were handled and lessons drawn from the system.

Structure of the system: The system was structured from community level, where after awareness on HAP, a committee (complaints handling committee) was elected covering villages at group village headman level. This committee was meant to receive complaints from community members on project activities being implemented by the project, to scrutinize every complaint being raised and provide feedback to the complainant if they have the response. If the complaint needs redress from organization office, the committee was channelling the complaint to the district office through HAP focal person who in turn was channelling the complaint to head office HAP focal person, if he does not have the response to the complaint raised. Head office HAP focal person was responsible for directing the complaint to organization management for redress. The response to any complaint was going through the same channel up to the complainant at community level. If redress needed to be done through a meeting, concerned group of people were convened for feedback.
Complaint received and handled: During the project implementation complaints were raised by community members as follows:

- **Targeting of project activities beneficiaries.** Some community members complained that targeting of beneficiaries for some project activities like small livestock production (goats, guinea fowl) were leaving out deserving members. The complaint was handled through clarifying the beneficiary selection criteria and verifying the project list of beneficiaries to flash out beneficiaries who were just incorporated by local leaders for being relations.

- **Quality of project inputs.** Some project beneficiaries participating in goat production complained that some goats being supplied by the supplier were small in size. The complaint was handled through raising the issue with the supplier and he was asked to withdraw all goats which were deemed to be small by the beneficiaries and replace them with bigger ones.

- **Refreshments during trainings.** Some project beneficiaries complained about how one project officer handled them during training by providing them small bans as opposed to Obama which they were used to without any explanation. The issue was handled through raising it with responsible officer who indicated that bans were given as an option, as Obama were not available on the market during the period of the training. Redress was done through conducting a meeting with concerned group of community members where an explanation was given why things was done the way they were done.

**Lessons learnt.**

- Complaint handling mechanism system provide a platform for community members to seek redress of their issues on the project whereby increasing both quality of project activities being implemented and ownership of project activities.

- Complaints are channelled verbally because of high illiteracy levels making it difficult for some members to raise their complaint because of its sensitivity. Phone numbers of project officers were shared, so that whenever they have an issue deemed sensitive they would call to HAP focal person at district level or head office level.

2.3. **CARD**

CARD has developed a simple and well defined complaints mechanism with the communities. The mechanism acknowledges the nature of the complaint and categorises the complaint. Most of the complaints are found to fall into three categories, i) complaints against project staff (staff conduct and delivery of services), ii) complaints against community leadership (conduct of Village headmen or Project Committees) and iii) complaints against Government extension staff conduct.

Depending on such complaint categorization, different complaints are therefore directed to different persons/officers through local structures, who by their mandate handle the complaints for redress. Communities were still informed and encouraged to be free to direct the complaint anywhere else they feel they will receive the right redress, even if it means bypassing the recommended channels, i.e. reporting the staff complaints directly to the Programme Manager at CARD’s Head Office in Blantyre or, if it is against their local leadership, reporting directly to the Traditional Authority (T/A). Information (including
telephone numbers) about the suggested complaints handlers was therefore made available to the communities. CARD piloted the use of suggestion box, where those who are able to write can post their suggestions, concerns or complaints seeking redress. CARD together with the communities are monitoring the effectiveness of the system and drawing recommendations.

Conclusion:
DCA Malawi Complaints Committee did not receive any complaints in 2012, but complaints received were only project operation such as one indicated in the ACT appeal response for Karonga. Reporting on Complaints Handling Mechanism has been a challenge, and only three partners above from PT3 provided the report on Complaints Handling System. It is also difficult to provide a report on sensitive complaints due to confidentiality.

Report from Ethiopia
Prepared by Samson Melesse Tesema, Procurement Officer and Eyasu Mekonnen, Regional Representative

1. Short description on the progress of the system and whether the partner/you find the system valuable for DCA.

In general we find the Complaints Handling System very valuable for DCA. Like any other system, DCA Ethiopia complaints handling system has strengths and weaknesses. Here are some of the strengths and weaknesses based on the complaints we received (handled) in the report period:

1. Strength:

   - It is accessible for beneficiaries, staff, partners, consultants and any other interested groups.

2. Weaknesses:

   - The Scope of our Complaints handling system in areas of partners, staff complained especially about recruitment process, firing staff in DCA funded projects, etc.
   - The primary goal of our complaints handling system is designed for beneficiaries, but the complaints received from beneficiaries are found very minimum which shows the system needs to be further strengthened at the beneficiary level

3. Observations for system improvement

   The complaints handling system should be strengthened at the partner level and it should be beneficiary context specific.

   - DCA should invest more time to strengthen partners' complaints handling system so as to receive more complains from real beneficiaries
• Capacity building work of DCA staff in areas of HAP also needs attention, so that the staff can follow the progress easily

Please find below a summary of the complaints and response undertaken in 2011. The complaints report is divided into two groups. The first contains all the complaints received through our complaints mailbox and the second includes some of the complaints received at partner level.

1. Complaint # 1
   a. Quality of beans during the food aid assistance

   DCA monitoring team learned from the beneficiaries of the food aid assistance in September 2011 that in the food ration package, the protein source beans were damaged and advised DCA to follow up on subsequent distributions.

   b. DCA response

   DCA procurement officer communicated with the partner and the investigation indicated that due to shortage of the commodity, the supplier provided beans from recent harvests which were not dried very well. This caused the smell which beneficiaries reported. Beneficiaries were advised to cook/roast the beans before eating. The supplier corrected the problem by supplying well dried beans for subsequent distributions.

2. Complaint # 2
   a. Complaint from a Consultant

   A consultant, who had not been chosen for an assignment, complained about the procedures that DCA followed in procurement of consultancy services. He said that to the best of his knowledge, DCA had never been transparent with regard to the procedures; for example the TOR issued thus far had not indicated the relative point scores and measurement criteria for technical and financial proposal. He mentioned a concrete example and referred to other organizations’ standard procedures.

   b. DCA Response

   We thanked him for expressing his reaction to the decision and assured him, that we were taking his points seriously. The procurement group at the office found that DCA had acted in the most transparent and accountable manner in the announcement, screening and evaluation of the technical and financial proposals. DCA has a procurement manual and procedures which are drawn from the manuals of international donors like EU, ECHO and USAID etc.

   As per DCA Procurement Manual the consultancy service in question was under NEGOTIATED procedure, even if we advertised through local media. The bottom line is that it is under OPEN tenders amounting to >50,000 Euros that we are obliged to undertake a lengthy and open processes. We want to be as transparent as possible, but at the same time to be efficient in the use of our limited resource in the
management of such procurement services. We hoped for his understanding of this dilemma and thanked him for holding us accountable to our decisions.

3. Complaint # 3
   a. Delay and denial of payments for Cash for Work (CFW) activities
      A DCA commissioned consultant reported in his terminal evaluation report “…target communities in Magole Kebele of Dillo district (Borena) complained about delay and denial of payments after the end of CFW activities. The management (implying the partner) did not take timely corrective actions in response to complaints of members of community…”
   b. DCA Response
      The issue was forwarded to the Complaint Handling Committee and the committee instructed the Regional Representative to request an investigation report from the partner. The partner investigated its staff and found out that one of its field staff had colluded (collaborated) with a government village development agent to collect money from beneficiaries after the distribution of cash with a pretext of mandated by the local government. DCA assessed the situation and proved that the swindle was done after the partner paid the cash to each beneficiary. Beneficiaries were asked by the individuals to contribute money for unknown schemes. Based on this investigation, the partner dismissed the guilty staff and put two supervisors under warning for lack of strict monitoring. The Government office has been informed and advised to take action on its staff.

      DCA and the partner feel that the event took place after payments were made and away from project areas in the villages, and we cannot assume direct responsibility.

4. Complaint # 4
   a. Complaint from partner staff who was not selected for a post in a DCA financed project
      DCA received a complaint lodged against a partner in the areas of:
      • Lack of transparent and respectful staff management
      • Discriminatory practices
      • Lack of participatory staff management
   b. Partner’s response
The partner explained that the reason for not selecting the staff member for the post was due to a number of complaints from other staff members about this staff member; he was said to undermine his colleagues, addicted to chat and alcohol during working hours etc. The decision was not based on discrimination or any improper action on the partner’s part.

5. Other Complaints or request for clarifications

We also received complaints (actually request for clarification) on our procurement decisions for consultancies and staff hiring. Three candidates have requested an explanation of the recruitment process and their results, to which DCA responded to their satisfaction. This usually happens due to the inclusion of the complaint address on our standard outgoing letters.

Report from Cambodia
Prepared by YouMeng Chiv, Programme Officer Cambodia

I. DCA/CA Complaint Mechanism:

As in last report, DCA/CA Cambodia Complaint Mechanism was initiated and put into force in late 2010.

There is very little progress regarding the DCA/CA complaint. Even though the complaint leaflets and forms were distributed to partners, complaint orientation workshops were conducted and complaint box was established, DCA/CA did not received any complaint in 2011.

Most partners have not had any clear responding mechanism, policy/procedure and structure. As mentioned by partners, some cases of complaints had been received in the report year with no real figure. Mostly the complaints - feedback, suggestion and comments - were related to only operation and constructive feedback for next time improvement. Partners have not had any proper filing and data recording system in place for such operational complaints. Moreover, there had been written in meeting minutes or meeting notes regarding partners’ sensitive complaints; some cases were informed to DCA/CA, but were not fully shared with DCA/CA as it was the partner’s internal institutional issues.

However, some partners mentioned that they have not had proper complaint policy and mechanism, but partners have
- put up suggestion boxes in the activity venues for participants both rights holders and duty bearers, who come to participate in partner’s activities to give comments, suggestions and feedback
- posted flipchart marking as “park your comments/suggestion here” and ended activity evaluation form with some feedback and improvement points
- asked involved stakeholders to give comments and feedback by sending email to director and management team
- directly posting online of suggestions and comments on partners’ website

Mostly, feedback, suggestion and comments were related to only operation and constructive feedback for next time improvement; and no sensitive complaint.

Moreover, DCA/CA Cambodia Complaint Mechanism was shared in some meetings with partners and other networks, especially during 2011 Cambodia flooding period, to ensure accountability and transparency of the flood response. In addition, training on Introduction to HAP & Sphere Standards & Application of Quality & Accountability (Q&A) in Food Security & WASH was organized in late 2011 by DCA/CA-Cambodia, and facilitated by CWS Pakistan-Afghanistan for 22 participants of ACT-Alliance members, namely PADEK, CWS-Cambodia, CWS-Vietnam; NCA-Vietnam; LWD and FCA-Cambodia. This training aims at building partners’ capacity, especially regarding ensuring transparency, accountability, quality and effectiveness on emergency response to the Cambodia Flood 2011.

There has not been any complaint received during reporting period. However, to ensure partners’ participation and accountability during each partners’ platform meeting of the three programme types in Cambodia – PT1, PT3 and PT4 - and individual partner’s meeting with DCA/CA Officers a lot of inputs such as comments, feedback, suggestions from partners have been received as operational complaints regarding programme improvement, reporting, targeting, participation, accountability and transparency.

Only LWD (localized form of LWF), a partner of PT3 and PT4 DCA/CA, has had its Feedback and Response Mechanism policy fully enforce in report year. At LWD alone, 11 cases of operational feedback were received in 2011. Among those, eight cases were related to the emergency response in which the communities clarified the criteria for the selection of beneficiaries and the transportation support for beneficiaries to receive aid assistance. All LWD’s 11 feedback cases were closed with response and clarification feedback. (See detail in LWD reports bellow).

As mentioned above, most partners informed that they have not had proper complaint policy and mechanism in place, but they have had a practice without any clear policy and mechanism; the challenges are
- no proper follow-up and response mechanism in place
- no proper committee has been formed/established
- no confidential provision has been written/ensured

II. Brief LWD FEEDBACK AND RESPONSE MECHANISM (FRM) report 2011 as partner of DCA/CA in Cambodia, who has its complain mechanism in place

1. Background

In 2010, LWD has started to develop the Feedback and Response Mechanism (FRM). The FRM Policy and Procedure with feedback form was developed and approved by LWD's Management Team in late 2010. The Feedback Handling Committee (FHC) and Feedback Focal Point (FFP) were set up both at the Area Program Office (APO) based in the
operational districts and at head office in Phnom Penh. In addition, telephone hotline was available and LWD announced to all staff to be aware of this alternative means to provide feedback. The orientation on feedback and response mechanism was conducted to all staff and to 13 LWD target villages.

2. **Progress of Feedback Mechanism**

2.1 **Main activities in 2011**

**Feedback box:**
- In early 2011, 20 feedback boxes were produced of which one box was placed at LWD’s head office, six boxes were placed at six Area Program Offices and other 13 boxes were placed in 13 LWD target villages as a pilot.
- LWD is now in the process of producing feedback boxes to be placed in the rest of the target villages.

**Dissemination of feedback mechanism**
- Annual staff consultative workshop in September 2011 – FRM was used as the mechanism to address staff’s concerns. Occasionally, the progress of the FRM was also presented to all staff as part of sharing the result and the available mechanism that staff could use and benefit from.
- Annual Executive Management Team (EMT) visit – during the visit, the EMT also introduced the mechanism to all staff in six Area Program Offices and head office.
- Posters – LWD produced posters to inform stakeholders, particularly the communities, of their right to provide feedback on the operation and performance of LWD. The posters also detailed the types of feedback and the confidentiality of the feedback handling process as well as how to provide feedback to LWD. The poster is now in the process of being distributing to all the target villages.
- Flood emergency response – LWD applied the FRM in the whole process of emergency response, for instance the selection process of beneficiaries and emergency aid distribution. In the assessment stage and selection of beneficiaries, LWD introduced the FRM to the communities if they found any irregularity in LWD’s operation and wished to provide feedback. At the distribution points, a committee of FRM was set up with the involvement of LWD’s staff and local authorities and introduced to the beneficiaries. In addition to this, on the list of aid items was also stated the FRM through which the communities could provide feedback on the operation including the quality and quantity of each aid assistance item.

2.2 **Feedback received**

LWD’s Staff gradually has demonstrated their interest to use the mechanism to provide feedback. Most of the feedback was to improve and clarify the LWD’s programme operation. In 2011, 11 cases of operational responses were received. Among of those, eight cases were related to the emergency response in which the communities clarified the criteria for the selection of beneficiaries and the transportation support for beneficiaries to receive aid assistance.
2.3 **Feedback handling**

All 11 cases of feedback were closed with response and clarification back.

3. **Challenges and lesson learnt**

- It takes time to build the staff’s understanding and trust in the process of handling the feedback.
- From the feedback received during the emergency response, LWD learned that a telephone hotline was very useful and works well since the communities provided the feedback and clarified easily.

4. **Next plan**

- Continue to promote the use of FRM particularly among staff and the communities
- Disseminate the posters and feedback boxes to all LWD target villages
- Promote FRM in all aspects including in the staff recruitment and procurement process

**Report from India**

Prepared by Mani Kumar, Humanitarian Response Officer

From May 2011, DCA South Asia established a Complaints Mechanism at South Asia Regional Office (SARO), India. In December 2010, DCA India initiated the process of developing a South Asia Complaints Mechanism (CM) as an action point of the HAP audit held in June 2010. It took time to finalise it in consultation with DCA HQ. Draft copy was finally approved in late Feb 2011 by DCA HQ for sharing with DCA staff and partners in South Asia.

In March 2011 South Asia Partnership met, and the South Asia Regional Office rolled out the complaints mechanism with all partners through presentation. TOR for complaints mechanism was shared with partners for feedback and further consolidated in April 2011.

Since May 2011, the SARO complaints committee has been functional comprising of SARO Regional representative, Head of Human Resource and Head of Programme (HAP focal point). This committee as per TOR works closely with committee in DCA Head Quarters.

**Complaints received**

Prior to formal complaints mechanism in place, there have been only few complaints lodged with DCA South Asia from beneficiaries regarding partners on project interventions, targeting and support provided in humanitarian projects.

However, those submitted have been analyzed and resolved by the respective partners with support and guidance from the South Asia Office. One complaint against a DCA staff was
submitted by e-mail to the SA Regional Representative (RR) who subsequently investigated and had a good discussion with the complainant.

Between May and December 2011 there have been no complaints received by the committee.

Complaints mechanism in place

Complaints committee at SARO receives complaints through e-mail at southasiacomplaint@dca.dk. This has been shared with staff and partners. This committee will meet quarterly to review complaints received. E-mails will be checked regularly.

Recommended STEPS

- Step 1: Complainant having access to SARO will register complaint on southasiacomplaint@dca.dk.
- Step 2: Having received the complaint, the Complaints Committee will meet, discuss and agree on the course of action. Depending on the nature of the complaint, the Complaint Committee may invite other staff for additional verification.
- Step 3: The Complaint Committee shall appoint the PO (managing the programme) who will file complaints in the system on DCA internet link.
- Step 4: The Complaint Committee shall then set about finding the facts, working within the policies of the organisation and complete the investigation.
- Step 5: Based on complete investigation, evidence received and discussions the Complaints Committee will make a final decision in consultation with DCA HQ Complaints Committee and take action (if required).

Report from Myanmar PT1 Programme
Prepared by Nay Moo and Jonas Vejsager Nøddekær, Regional Representative

Action Report on Humanitarian Accountability Framework and Complaint Handling

Humanitarian Accountability Framework (HAF)
During 2011, Myanmar Programme has achieved self assessment on HAP and developed HAF with the participation of all colleagues and support from HQ personnel. During the process, references were used from HAF of HQ and Ethiopia, consulted with some colleagues and reviewed the draft together with all staff. As Myanmar PT1 programme is going to terminate by the end of 2012, the HAF of Myanmar PT1 programme is developed for 2011-12 and it is concluded in September 2011. In November 2011, HQ supported the DCA Myanmar Programme on technical matters at RO.

Complaint Handling System (CHS)
In November 2011, DCA HQ delivered technical support to DCA Myanmar and its partners in Yangon. During that event, DCA Myanmar and its partners received concept and technical inputs
on complaint, feedback and accountability issues. DCA Myanmar has learnt how to develop a CHS and will continue to finish it in 2012.

**Partner’s Complaint**

**Contents of the complaint**

One of DCA partners submitted a complaint letter in early 2011 complaining that DCA did not trust the partner and unfairly had accused them of financial mismanagement. The complaint letter was sent following a DCA visit to the partner which was a combined mission of project monitoring and annual financial audit.

During the partner visit, some issues of improper compliance with the DCA financial guidelines were raised and discussed, and as a result of this the partner staff felt it was an expression of mistrust from DCA towards the partner.

After the partner visit, the representative, on behalf of the partner staff who was present during the DCA monitoring and financial visit, sent a complaint letter to the Regional Representative (RR) of DCA Myanmar.

In the complaint letter, the partner explained that they had unilaterally decided that they would stop the DCA funded project because of the above matter.

**What did we do?**

Upon receiving the complaint the RR tried to gather more information about the episode by having separate meetings with each of the involved individuals including the representative from the partner and a senior adviser working part time for the partner organisation. After getting this clarity a reconciliatory process was put in place through which the partner staff understood that DCA took the matter seriously and worked to find a suitable solution.

During the process the RR also expressed to the management of the partner that a unilateral decision to stop a project was very serious and this even before the DCA RR had an opportunity to know about the matter. Using poor and marginalised communities as hostages in a matter which only involves DCA and the partner is serious, and the RR explained that DCA would not accept such action in the future.

As a consequence of this complaint DCA Myanmar has now made an extra effort to ensure that all partners are aware and know of the financial management expectations of DCA and our back donors. A special topic about Audit requirements has been included in the financial management training provided by the DCA Finance officers.

**Lessons learned**

Prior to a partner visit, it is very important to explain the expectations and which areas will be covered, especially with a deadline on something as potentially complicated as an external audit. Both DCA and partner need to ensure that even under stress and hard conditions it is important to make certain that communication and dialogue is always done in a respectful manner, even when there are disagreements or misunderstandings about the issue.
Prepared by Fatmire Uka, Programme /Operation Manager

HAP Background of implementation
The HAP Complaints Mechanism was introduced to DCA HMA ANGOLA programme in March 2010. HAP forms part of the Angola Quality Management Systems (QMS) having its own dedicated procedures.

HAP Process in Angola
A key part of the complaint process is to identify any issues that need to be addressed in order that similar issues that may otherwise have lead to complaints do not arise. In order to monitor effectively, a year-end evaluation is carried out and a progress report written based on feedback from beneficiaries. Achieving the correct balance is culturally difficult, and whilst complaining is not encouraged per se to the extent where there would be severe impact on the programme administration, it is vitally important for nationals to actively participate in areas of grievance; one of the biggest challenges is encouraging this participation. It is therefore important to clearly explain the purpose of the complaints mechanisms and highlighting that benefits of current aid or future aid will not be affected by their participation.

The HAP process follows detailed guidelines and procedures.

Staff
All employees are encouraged to confide confidentially on issues they have, but experience shows that the seriousness of the complaints procedure is no taken in the correct context. Examples of the past are waste paper and printer test papers put into the box.

We are satisfied however, that everyone understands that the structure is in place, and that complaints received are addressed at senior management level. This structure involves reporting any issue directly to their supervisor, and if they are not satisfied then they go to the next line manager until satisfaction is reached. Alternatively, if some issues are sensitive then they come to discuss directly with the internationals whose confidence they trust.

Beneficiaries and stakeholders
The villages near the project working areas have received a number of visits by the Community Liaison Officer. The village head has been informed of our policy and that openness from his people is encouraged towards our activities and behaviour in the surrounding areas.

Due to the lack of previous responses to complaints and in order to explore the reasons why, the OM/PM, together with MRE Supervisor held a meeting with all staff and the head of the villages where DCA is operational. In general they see no need for that since their culture, headed by the village chief, is that any complaints go directly through him and they see no reason to change that; however they are aware that if they are dissatisfied, they can come to the PM according to the open door confidentiality policy.
For those who are unable to write or prefer to make a verbal complaint (as may be the case of certain beneficiaries who live in areas with a low literacy rate, the person responsible for receiving the complaint will translate the verbal complaint into writing. The complaint can be either directly from the individual or organisation making the complaint or via someone acting on their behalf such as a beneficiaries committee or a beneficiary representative.

In practice there is always a DCA Supervisor present during operations who the community can freely address issues to, and they can also take direct contact with the Community Liaison team if they feel they are not getting attention.

The village heads have conveyed that they are happy with the procedures we have and the contact established through the Community Liaison Officer with whom they would discuss issues should any arise. They are confident that any issues will be handled correctly if there is a need.

Number of complaints in 2011

We have not received any complaint forms in 2011, although every effort has been made to publicise HAP.

Fraud case - Misuse of DCA name
On September 2011, one representative from CNIDAH (ANGOLAN MINE ACTION AUTHORITY) together with a DCA ANGOLA local employee were involved in an unauthorized and illegal contract with a Portuguese construction company ‘MATRA CASA E CONSTRUCAO’ on road clearance in Lucusse.

We were informed of the above by the MAG ANGOLA, Operation Manager who was subsequently tasked by CNIDAH to do the above road clearance. The local DCA employee was suspended.

What did we do?

We thanked MAG OM for the information and explained that we do not conduct road clearance activities in Angola, however we promised to initiate an investigation.

We went to the village of Lucusse to talk to the site manager of the Portuguese company who revealed that the contract was entered into in April 2011 in our office in Luena during the Easter stand down, when all national and international staff were on leave. The contract had been signed by the DCA MRE Supervisor on behalf of DCA. We were given copies of the email correspondence and invoices; the invoices had DCA name and logo with the first payment of the contract at USD 49,000 and the second at USD 51,000.

The case was reported to the police in Luena. On 8 September 2011 the DCA employee was detained by the police and released on 16 September. The case was taken to court.
Internal investigations were conducted so as not to interfere with official investigations. Discussions were further held between DCA and the employee who resigned from the DCA employment on 15 November 2011. The internal investigations revealed that CNIDAH employees were also involved although the extent cannot be proved; this is extremely alarming.

**Subsequent information**

MAG ANGOLA should have been involved in this too, but they did not want the exposure they would have been subjected to and rejected the case as a DCA issue. The facts are that MAG were tasked by CNIDAH to conduct a commercial road clearance task, and they did the job whilst CNIDAH and DCA national staff signed the contract on behalf of "DCA". It is therefore reasonable to assume that there was some MAG involvement too.

Gitte Krogh
April 2012