



**COMPLAINTS  
REPORT  
2013**



## DanChurchAid Complaints Report 2013

This is DanChurchAid's (DCA) fifth Complaints Report. The report covers the calendar year 2013 and is available at the DCA website together with all the previous Complaints Reports from 2009, 2010, 2011 and 2012.

Part 1 is general information about the daily administration of the Complaints Handling System (CHS).

Part 2 is a report on the activities and themes which have given cause to complaints in the DCA Complaints Handling System in Copenhagen.

Part 3 is a report on complaints from two international DCA offices.

### Part 1: General information

From 1 January to 31 December 2013 the office in Copenhagen received 60 complaints. It is a decrease compared to 2012 when we received 94 complaints, of which 24 were about the wall that DCA's youth organisation erected at the Roskilde Music Festival in July 2012. Thus we have received 34 complaints less than in 2012.

The complaints are of both sensitive (8) and operational (52) character and include our Danish as well as our international activities.

Sensitive complaints are defined as complaints about corruption, sexual abuse/harassment or other serious breaches of our code of conduct. The number of sensitive complaints is at the same level as in 2012. Specifically, the development in the number of corruption cases has been 11 in 2010, one in 2011, eight in 2012 and seven in 2013. It is not clear what has caused this large discrepancy.

In addition we have received one sensitive complaint about possible sexual abuse of one employee working in a partner organisation.

The operational complaints (52) are mainly about our fundraising activities, i.e. activities including telemarketing, street fundraising, various campaigns and the annual parish collection. The telemarketing campaign in which we contact people by telephone totals 17 complaints. Of these, ten are from donors who have been asked to increase their contribution.

We still receive complaints about our street fundraising, which in 2013 amounted to seven complaints. Both telemarketing and street fundraising are very important fundraising activities for DCA. The number of

complaints should be compared to the fact that we contact approx. 130,000<sup>1</sup> persons annually in the streets through our face-2-face campaign, and that 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.

	2011	2012	2013
Total number of complaints received in Copenhagen	35	94	60
Number of sensitive complaints thereof	1	8	8
Number of operational complaints	34	86	52
Complaints about fund-raising activities	33	53	44
Number of tele-marketing thereof	9	20	17
Number of street fundraising thereof	6	11	7
Cancellation of donations and complaints about technicalities	10	13	13
Complaints about the parish collection	3	6	4
Complaints about buy aid	5	3	3
Complaints about organisational matters	1	26	8

### Transparency by publishing corruption cases

The 2013 corruption cases are reported in a relatively detailed manner. The purpose is to ensure transparency to donors, media, external donors and other stakeholders. In addition, corruption cases are published currently at the DanChurchAid Danish and English websites, [www.noedhjaelp.dk/anti-korruption](http://www.noedhjaelp.dk/anti-korruption) and [www.danchurchaid.org](http://www.danchurchaid.org). 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.

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<sup>1</sup> 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.

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, a DanChurchAid Board member will go through specific cases in order to secure the quality of the processing of the case.

### **Complaints about organisational matters**

There has been a decrease in the number of complaints in relation to organisational matters. In 2012 we received 26 complaints in this area, of which 24 were about the wall erected by the DCA youth organisation at the Roskilde Music Festival. This means, however, that the real number of complaints about organisational matters has increased.

The category includes e.g. complaints about volunteers in second-hand shops, complaints from youth volunteers sent abroad and complaints about possible breaches of internal management values or policies. In 2013 we received eight such complaints, and below we give a more detailed description of these cases.

### **Follow-up on cases**

Some of the operational cases have resulted in an adjustment of procedures or an internal discussion in order to prevent more complaints. However, we quite often find that there are already clear procedures and guidelines, which, in the specific case, were not observed. Thus the case does not require further follow-up other than stressing the existing guidelines.

In general the Complaint Handling System (CHS) functions well, and there is a basic backing and understanding of the system in the organisation. Thus, the system is now an integral part of the general administration in DanChurchAid.

## **Part 2: Examples of specific complaints lodged in DanChurchAid's Complaints Handling System in Copenhagen**

### **Corruption cases from 1 January to 31 December 2013**

**2013.C01**      **Contents of complaint:** One of DanChurchAid's partners in Kenya has experienced a case of corruption. The partner's country representative wrote to DanChurchAid to inform them that through their internal control systems some suspicious financial transactions in the project were discovered which may indicate misuse of funds or fraud. As soon as it was discovered, the partner initiated an internal investigation. The partner has confirmed that improper use of funds has taken place. The fraud includes employees from the economy and procurement office. After the discovery the partner has indicated that they want to cover all confirmed losses from their own funds and to keep all financial obligations to partners and beneficiaries.

**What did we do:** DanChurchAid called a meeting with the partner's country representative in Nairobi and was informed that preliminary investigations showed that considerable amounts have been lost, but that some of the money was later paid back.

Measures have been made to prevent further fraud, and action has been taken to strengthen certain internal controls. During the investigation the partner moved certain functions from the office in question. The partner's own investigations have established the extent of the fraud, and funds originating from DanChurchAid have been returned to DanChurchAid. It is a matter of DKK 22,800 (KES 353,400). In addition legal action has been taken against the employees in question.

**Lessons learned:** One experience of the partner is that it is important to carry out a complete audit of the whole organisation and not only an audit of individual projects, if it is possible at all because of different time schedules of the individual projects. Separate audit of the individual projects makes it easier to hide a possible fraud. DanChurchAid will use this knowledge in our future counselling and financial monitoring of our partners. This case also stresses the need for future focus on financial capacity building of our partners, and also to make spot checks to assure ourselves that our partners are following their internal control procedures.

2013.C03: **Contents of complaint:** An amount equivalent to USD 3,500 disappeared from one of DanChurchAid's international offices.

**What did we do:** The money had been collected in the bank 12 hours earlier, and neither the office manager nor the head of the finance department could explain how the money had disappeared. The money was kept in a locked safe in a locked office. Apparently there were no serious breach of routine or procedure, and no suspicious persons who could be accused of stealing the money.

**Lessons learned:** A slight improvement of the procedures in connection with counting of the cash balance and placing of keys was implemented.

2013.C04 **Contents of complaint:** A supplier accused an employee of receiving commission when making procurement contracts. The complainant was considered trustworthy.

**What did we do:** The employee denied the accusation, but in the light of earlier disciplinary problems and warnings it was decided to dismiss the employee in question.

**Lessons learned:** Apparently, the system worked as intended, as the supplier in question trusted DCA enough to draw attention to the problem.

2013.C05 **Contents of complaint:** A very reliable source informed DCA that a new employee was accused of corruption in connection with a previous appointment. A very detailed description of that case was available as well as the role of the employee.

**What did we do:** After consultations and a thorough scrutiny of the material DCA decided to dismiss the employee after the probation period.

**Lessons learned:** All procedures in connection with recruitment had been observed, and there was no cause for further action.

- 2013.C06      **Contents of complaint:** The local contact person and accountant in a second-hand shop discovered that payments to the bank of the daily turnovers were missing. A specific volunteer came under suspicion.
- What did we do:** After reporting the case to the police the volunteer in question confessed to embezzlement.
- Lessons learned:** The embezzlement had been going on for approx. two months. The reason for not discovering it sooner was partly due to a new accountant and partly to inappropriate accounting procedures. Consequently, in 2014 a new accounting system has been introduced in all the DCA second-hand shops, thus further minimising the possibility of embezzlement.
- 2013.C07      **Contents of complaint:** A volunteer was dismissed when it was found that the person in question had entered into unauthorised agreements on behalf of DCA . It was discovered when DCA received a number of bills and debt collections based on unauthorised contracts.
- What did we do:** The person was dismissed with immediate effect and asked to reimburse part of the amount.
- Lessons learned:** We are still considering if it is possible to introduce a code of conduct for the volunteers and if it is necessary to tighten some of the internal routines.

### **Follow-up on corruption cases from 1 January to 31 December 2012**

- 2012.C02      **Contents of complaint:** DanChurchAid supports a local partner organisation in Bangladesh called Warbe DF. Some irregularities were found in connection with documentation and “over-ordering”. More specifically, there was a false invoice on office supplies. In addition, an employee with Warbe DF ordered food and office supplies for 155-160 persons although only 90 persons participated in the workshop in question.
- What did we do:** DanChurchAid asked Warbe DF to delete the false items and figures from the financial report. Warbe DF gave the involved employees disciplinary punishment. Furthermore, Warbe DF has employed an experienced chief accountant to check the financial transactions.
- Lessons learned:** The partner organisation is fully responsible for the financial transactions. However, DanChurchAid can assist in building up the competence of financial management, if the partner wishes to invest in capacity building.
- The partner is responsible for controlling the financial transactions, and if a small partner has to control a large amount, DanChurchAid should invest in capacity building. In a country like Bangladesh with extensive corruption, DanChurchAid should attach experienced financial employees who can offer the partners the necessary assistance to monitor and audit the projects.

## **Fundraising in Denmark**

### **Telemarketing activities (phoners)**

Telemarketing was the area of work from which we again received the highest number of complaints in 2013, a total of 17 complaints. The complaints can be broken down into the following themes

- Complaints about repeated calls asking the person to increase his/her contribution
- Complaints in general about being contacted and a request to stop it

DanChurchAid received ten complaints about phone calls asking the donor to increase his/her contribution in 2013. We know, naturally, that loyal donors are irritated by repeated contacts; however, loyalty analyses made by the CEM Institute show that DanChurchAid is below average regarding how often we contact the respondents who already are supporting the organisation. Consequently, we do not change our present routines.

All complaints have been answered in a friendly and open manner. We have immediately cancelled the contributions of those who wanted it; we have removed telephone numbers from our call lists and we have followed up with the employees/coordinators in question in cases of specific violations of our ethical guidelines for telemarketing which can be found on DanChurchAid's website.

### **Street Fundraising**

We still receive complaints about street fundraising. In 2013 we had seven cases.

The complaints can be broken down into the following themes

- Complaints about donations, which the donor thought was a one-time donation, but instead turned out to be a current donation agreement
- Complaints about feeling pressurised to sign a contract in the street
- Complaints that the street fundraisers receive salary and are not volunteers
- Complaints about the behaviour of the street fundraisers

All complaints have been answered in a friendly and open manner. We have immediately cancelled the contributions of those who wanted it, and we have followed up with the employees/coordinators in question in cases of specific violations of our ethical guidelines for street fundraising which can be found on DanChurchAid's website.

### **Buy aid**

In 2013 we received three complaints about our business cooperation with buy aid. It is the same number as in 2012. In all the cases the complainants felt cheated because they thought that they supported a humanitarian purpose 100% through their purchase and not with only the 10%, which buy aid donates to DanChurchAid. In all cases we followed up with buy aid and stressed that they should make it clear to the buyers that they are contacted by buy aid and not DanChurchAid and how much of their donation will go to the humanitarian purpose.

### **The Parish Collection**

In 2013 we received four complaints about the Parish Collection. The complaints included

- Complaint about a collector trying to open a door which scared the complainant
- Complaint about a collector who entered a private home without permission
- Complaints about brochures/giros left at the address

We apologized deeply to the complainants regarding a collector opening a door and entering a private home without permission, and we have asked the responsible coordinators to call the attention of the collectors to the complaints. We apologized for the brochures/giros left at private addresses.

### **Complaints about cancelling of donations and technical issues**

13 complaints were about cancelling donations and more technical issues, e.g.

- Cancelling an agreement due to various conditions
- Complaints that membership of Nødstrøm results in contribution to DCA
- Links in mails and at websites that did not work
- Complaint about error in giro sent out
- Not possible to get gift voucher in Bilka Supermarket & Department store

We have followed up on all complaints of this kind and thereby ensured that the contribution was cancelled and that links and other technicalities are working again.

### **Organisational matters**

The number of complaints about organisational matters has decreased from 26 complaints in 2012 to seven in 2013. The reason for the big reduction is that 24 complaints in 2012 were about the wall that the DCA youth organisation erected at the Roskilde Music Festival.

The complaints in 2013 were, among others, about the following

- Complaint from partner about termination of agreement on continued support
- Complaint from volunteer in connection with secondment
- Complaint about possible breach of DCA management values
- Complaint about breach of recruitment policy
- Complaint about a volunteer in a second-hand shop
- Complaint that DCA has become a party-political organisation

The complaint from a partner about termination of our cooperation was handled at one of our Regional Offices. The complaint was lodged by e-mail under a false name and submitted to a large number of embassies and international organisations. DanChurchAid was accused of violation of human rights, nepotism, corruption and sexism. All accusations were undocumented and of such a general character that they were impossible to investigate. Therefore, the sender of the e-mail was asked to substantiate the accusations. The anonymous complainant did not reply to this mail; DCA concluded that it was a matter of perversion of information, and we did not pursue the matter further. However, DCA informed the Office of the Auditor General in Denmark and the local authorities about the case.

The complaint from a volunteer in connection with secondment was mainly because the local leader had decided to withdraw the person from the area for security reasons in connection with illness. After a thorough investigation it was ascertained that the withdrawal was in total accordance with DCA procedures in case of illness. Thus the local leader had made a correct decision according to safety regulations.

A complaint about breach of DCA's management values, including accusations of discrimination, was handled via a thorough investigation of the unit in question, including interview with employees and

leaders. The conclusion was that no discrimination had taken place, even if there were a number of inappropriate structures in the said unit. There were examples of discrimination, inappropriate communication, unclear reference conditions and mandate, which came into focus during the investigation. This resulted in a process in the unit in order to improve these conditions.

The complaint about breach of DCA's recruitment policy was about a management level vacancy that was not announced publicly. The complainant found that it was against the DCA recruitment policy. The case was submitted anonymously through a different employee, which is possible in our system. According to our Staff Manual/recruitment policy the Board together with the General Secretary decide whether a management level position should be announced internally or externally; thus the Chairman of the Board and the General Secretary answered the complaint. Referring to the paragraphs of the recruitment policy and the Staff Manual dealing with recruitment of leaders/managers the complaint was turned down, as the vacancy announcement followed procedures in force. In the reply it was also problematised that the case was lodged anonymously, as the possibility of anonymity should only be used in sensitive cases. A complaint about a recruitment procedure cannot be considered sensitive, so the Chairman of the Board and the General Secretary are of the opinion that anonymity is close to the edge of the intentions of the possibility of anonymous complaints.

A complainant found that DCA was a party-political organisation as it was a co-signer of an advert inserted just before the national congress of the Danish Liberal Party. In the advert the Liberal Party was encouraged to reconsider its decision of reducing the development assistance by DKK 2.5 billion. In our reply we explained what such a reduction will mean to Denmark's development assistance and for the poor people in a number of countries. The advert was not a party-political contribution, but a contribution against a political decision. DCA has a good relationship to the Liberal Party, as for instance, the Chairman of the Liberal Party has been a DCA HMA ambassador.

A customer complained about a volunteer in a second-hand shop because she felt she was not treated well when she tried to donate some items in good condition, but the shop did not sell that type of items. The case was later discussed with the volunteers in the shop in question.

A complaint was later transferred to be handled in the internal employee system for complaints about salaries and conditions of employment.

### **Part 3: Reports from DCA's Regional Offices**

All DCA's regional offices except for Honduras now have complaint handling systems (CHS) in place and we are working on the implementation at the HMA programmes. By the end of 2013, 84 partners out of 219 had a complaints mechanism as compared to 2012 where 59 partners had a complaints mechanism. In addition, the five partners working with humanitarian assistance outside DCA focus regions in 2013 all had complaints mechanisms.

Please note that all sensitive complaints received at Regional Office or HMA Programme level have to go to Copenhagen; therefore information about these complaints are part of the reporting above. The regional offices are mandated to deal with operational complaints locally. These complaints are normally not about DCA staff or the programme, but mainly about the activities implemented by our partners. These complaints are often about selection criteria, information sharing in the communities, staff behaviour and the quality of programme activities.

A number of Regional Offices did not receive any complaints in 2013 and the partners have also informed that they have not received any complaints during 2013. Although, on the one hand it can be a good sign showing that partners are working well and delivering results, on the other hand one could imagine that

the rights holders/beneficiaries are not always aware of the existing complaints mechanisms. In 2014 we will continue to follow up more closely on complaints mechanism implementation by partners.

As the systems are being rolled out to DCA's Regional Offices and partners it has become very comprehensive and time consuming to collect information about all the systems. However, we have asked 20% of our Regional Offices to provide more detailed information about incoming complaints at Regional Office or partner level.

### DanChurchAid/Christian Aid (DCA/CA) and partners in Cambodia

The following report captures the 2013 complaints cases received by DCA/CA Cambodia and partners. Number of complaint cases received in 2013 relating to the DCA/CA and partners' implementation:

<i>Description</i>	<i>Received in 2013</i>	<i>Handled/closed in 2013</i>	<i>Pending to be followed up in 2014</i>	<i>Remarks</i>
Number of Operational complaints cases	LWD: 75 CWS: 01 BS: 44 PADEK: 21 PK: 210 DPA: 07 <b>Total: 358</b>	All cases were handled by the project site complaint committees; all cases have been closed	No	Note that these Operational complaint cases were received by DCA/CA's partners of the ACT-Appeal project regarding Cambodia Flood 2013. All cases were verbal complaints by flood victims. All cases were recorded/counted when flood victims came to talk with the complaint committee and/or called to ask questions regarding flood responses, including seeking clarification on selection criteria, process, questions etc.
Number of Sensitive complaints cases	<b>01</b>	no	Yes, will be handled in 1 <sup>st</sup> quarter	Case was submitted to several donors, thus DCA/CA was not able to handle it in 2013 as it needs coordination with others. At the time of writing this complaint report, the case has been investigated and followed up and is now pending final decision by DCA Complaints committee.
# Sub-total complaint cases	<b>359 cases</b>			We do not normally receive information from partners about the complaints they receive. Thus the total would be higher if including all partners.

### What was done and steps taken to improve implementation

- Regarding the ACT-APPEAL during flooding in 2013, the complaint committee was established at the project field by joint DCA/CA officers, partners' representatives and some local key focal persons/authorities.
- Complaint contact details were inserted into distribution kits, posted at the operation areas and informed to all involved people in the flood affected communities, where DCA/CA partners worked to provide humanitarian assistance.
- DCA/CA complaint leaflet has been updated; printed in 10,000 copies; and more than 6,000 copies distributed to partners and target groups.

- The DCA/CA Cambodia complaint mechanism has been revised; it will be shared with HQ for comments and inputs, and then be finalised hopefully in the second quarter of 2014.

## **DCA and partners in Malawi**

The following report compiles the formal complaints addressed to DCA, Act Alliance Forum Coordinator, and DCA partners in 2013. The complaints largely emanated from the beneficiaries and they were sent directly to DCA staffs or partners. Mobile phones were the choice of medium in reporting complaints by beneficiaries. One complaint was received from a partner concerning project management by DCA staffs.

As the report indicates all the complaints were addressed in due time to the satisfaction of the complainants. Further verification was done by partners to make sure the beneficiaries received adequate response.

However, we must admit that the handling of the complaints requires systematisation and institutionalisation. The Regional Office needs to work on making the system more accessible and reliable as well as transparent.

### **1. Complaints received by DCA:**

#### **a) Received from beneficiaries of a food security project**

**Complaint:** In May 2013, DCA received complaints from beneficiaries of the solar irrigation scheme at Kamphenda. The issue at hand is the planned solar irrigation scheme project which should have been functional before the end of 2012, but never materialised even in April 2013. The community sought explanation why the irrigation system has not been installed. The beneficiaries sent a petition to the Executive Director. They felt they had wasted a season worth of land which could have been cultivated, but lay idle in anticipation of works to install the irrigation system. The community expressed betrayal by the duty bearers for not installing the irrigation system. The Government initiative on Green Belt, which is providing seed and fertilizer to small scale irrigation schemes, has threatened to exclude the Gowa/ Kamphenda irrigation project beneficiaries because the system is not yet in place. A copy of the letter was given to DCA.

**Response:** DCA immediately engaged the contracted engineer to speed up installation of the irrigation systems at Gowa and Kamphenda. The systems were installed and handed over to the beneficiaries on 3<sup>rd</sup> July 2013. During a follow-up DCA monitoring visit in August 2013, it was verified that the systems were installed and beneficiaries were already using the system for food production.

#### **b) Complaint raised by community members to DCA in April 2013 on flood response project in Nsanje district**

**Complaint:** The complaint indicates that the targeting was not done properly.

**Response:** This complaint was forwarded to the partner through email who responded by verifying in the communities how targeting was done. DCA followed up again to verify if the issue was handled and the complainant was satisfied through project monitoring.

#### **c) A partner complained about DCA concerning project budget management (revisions)**

**Complaint:** The complaint raised the issue that a partner organisation did not know what budget it was supposed to be working from, since all staff who worked on the grant were not any longer in their positions. This gave the partner staff great concern, and they outlined their experience of the project as from the beginning of the project they had been asked to attend three full-day meetings, revise the budget multiple times, write their own logical framework exclusive of the one in the proposal, break the budget down by output activity, write a work plan exclusive from the one in the proposal, conduct a cash flow analysis. DanChurchAid had said they would redo the budget for all the partners because there was confusion about which budget to use. The partner received a revised budget, but the total for implementation was reduced by 21%.

**Response:** We thanked for the patience and understanding of the whole administrative mishaps about the budgeting process. DCA had identified the cause of the frustrations and explained that the misallocations were discovered after the agreement was signed. DCA Project Officer sent the partner a revised document and agreement.

## 2. Complaints received by Partners

### a. HIV/AIDS Program partner

**Complaint:** Beneficiaries and local stakeholders noticed a reduction of training days deviating from the project document. Most of the trainings were reduced from the initial five days to three days. The concern from the participants' point of view was that the time allocated was not adequate for meaningful interaction with the material being delivered.

**Response:** The partner revised the budget for the 2014 implementation year. The revision is aimed at ensuring that the costs of goods and services are in line with the prevailing market values. The revised budget will be given to the donor for consideration in 2014.

**Key lesson learned:** It was learned that it is vital to provide an opportunity for the community to express issues that are affecting their participation in project implementation.

### b. Karonga Floods Emergency Response Project

**Complaint:** The partner received a total of three genuine complaints during the three months' implementation of the emergency project in Karonga. These were as follows: target beneficiaries receiving different sizes of mosquito nets; some beneficiaries not receiving their entitlements because someone else received on their behalf; and some community members feeling left out during the identification process.

**Response:** Regarding mosquito nets, the partner engaged the supplier of the nets and resolved that a replacement of the wrong nets were to be carried out. The supplier obliged and the correct sized mosquito nets were distributed to the affected beneficiaries in the last month of distribution.

The complaint on emergency aid not reaching intended beneficiaries was reported at Mwanjasi village. It was reported that some beneficiaries who received on behalf of others did not deliver the items in full. This was mostly in form of cash and maize seed. Having received the complaint, the partner had a meeting with the Village Headman and the affected people, and the culprits were identified. The Village Headman rebuked the actions of the culprits and told them to give back in full the stolen items within a week. The partner followed up after a week and was convinced that the items were indeed paid back. It was also agreed during the meeting that no one should receive items on behalf of the other during distributions.

In and around Ngerenge area in Traditional Authority, Kilupula, the partner received a complaint that some community members felt sidelined as they were not targeted in spite of the fact that they were equally affected by the floods. To address the complaint, the partner in conjunction with the Area Civil Protection Committee held a meeting with the community in question to explain to them the selection criteria employed. After the meeting, the affected community understood that due to limited resources, the project was only targeting those who were severely affected, i.e those whose houses had collapsed or had serious cracks.

In the 2010, 2011 and 2012 Complaint Reports there are more information about the complaint handling systems in Malawi, Ethiopia, Cambodia, India, Myanmar, Uganda, Kirgizstan and the HMA office in Angola.

Gitte Krogh, 2014