





## DanChurchAid Complaints Report 2014

This is DanChurchAid's (DCA<sup>1</sup>) fifth Complaints Report. The report covers the calendar year 2014 and is available at the DCA website together with all the previous Complaints Reports from 2009, 2010, 2011 and 2013.

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 contains a review of the actions undertaken through the year to help DCAs regional and HMA offices and our partners to ensure the maintenance of an effective complaints system.

Part 4 Reporting on DCAs work on anti-corruption in 2014.

### Part 1: General information

From 1<sup>st</sup> of January to the 31<sup>st</sup> of December 2014 the office in Copenhagen received 72 complaints. This is an increase compared to 2013, where we received a total of 60 complaints. There is thus in 2014 received 12 more complaints than in 2013.

The complaints are of both sensitive (15) and operational (57) character and include our Danish as well as our international activities.

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<sup>1</sup> In the following named DCA

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 in 2014 has been doubled compared to the number of sensitive complaints in 2013. The number of cases related to corruption have developed from being 11 cases in 2010, 1 case in 2011, 8 cases in 2012, 7 cases in 2013 till reaching 14 cases in 2014. It is unclear what has been effecting the differences in the number of incoming sensitive complaints over the different years, but one of the reasons for the difference regarding 50% raise in incoming corruption cases from 2013 till 2014 could be the focus on spreading information regarding our anti-corruption policy in the year 2014 including the publication of DCAs own obligatory e-learning course, which all DCA officials were obligated to take during 2014, and which all new employees will henceforth have to take in connection with their employment.

We have also received one sensitive complaint about possible sexual abuse by an employee employed by a partner organization. The substance of the complaint which had been reported through the complaints mechanism were confirmed after an extensive external investigation commissioned by the involved partner organization. The employee who had been suspended during the investigation was thereafter dismissed.

The operational complaints (57) 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 15 complaints by people who has been asked to increase their contribution, people who do not want to be contacted at all by phoners or people who don't feel convinced about the message they are told regarding the collaboration between DCA and Emergency Energy.

We still receive complaints about our street fundraising, which in 2014 amounted to nine 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>2</sup> persons annually in the streets through our face-2-face campaign, and that we telephoned approx. 223,000 persons. However,

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<sup>2</sup> The figure is based on the fact that we get 13,000 new members every year. On average, maybe one out of 10 persons we approach in the streets becomes a member, meaning that we contact approx. 130,000 persons.

some of these did not answer the phone. On that background the number of complaints is very limited, fortunately.

	2012	2013	2014
Total number of complaints received in Copenhagen	94	60	72
Number of sensitive complaints thereof	8	8	15
Number of operational complaints	86	52	57
Complaints about fund-raising activities	53	44	24
Number of tele-marketing thereof	20	17	15
Number of street fundraising thereof	11	7	9
Cancellation of donations and complaints about technicalities	13	13	10
Complaints about the parish collection	6	4	7
Complaints about buy aid	3	3	1
Complaints about organisational matters	26	8	15

## Overview of the different types of complaints

	2012	2013	2014
<b>Fundraising activities</b>			
Buy aid	3	3	1
Parish Collection	6	4	7
Termination of contributions etc.	13	13	10
Telemarketing	20	17	15
Fundraising	11	7	9
<b>I alt</b>	<b>53</b>	<b>44</b>	<b>42</b>
<b>Operational complaints</b>			
Fundraising activities	53	44	42
Organizational matters	26	8	15
<b>I alt</b>	<b>79</b>	<b>52</b>	<b>57</b>
<b>Samlet antal klager</b>			
Operational complaints	79	52	57
Sensitive	8	8	15
<b>I alt, total</b>	<b>87</b>	<b>60</b>	<b>72</b>

## Transparency by publishing corruption cases

The 2014 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 DCAs 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.

DCA 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 DCA has

relatively few employees in each country, and it will be very easy to identify the complainants or the victims.

On behalf of DCA, a DCA 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 2013 we received 8 complaints in this area whereas we received 15 in 2014.

The category includes e.g. complaints about volunteers in second-hand shops, and complaints about possible breaches of internal management values or policies and we will be giving you a deeper knowledge of some of the cases in the following part.

### **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 DCA.

## **Part 2: Examples of specific complaints lodged in DCAs Complaints Handling System in Copenhagen**

**Corruption cases from 1. January to 31. December 2014**

**2014.C01**      **Content of the complaint:** in December 2013, DCAs regional office in Phnom Penh, Cambodia, received a complaint about suspected corruption (nepotism) in one of our partner organizations. The complaint was submitted to the majority of the partner’s donors. It claimed that a named senior member of staff had been involved in favouritism and abuse of power of various kinds. DCA asked to have the matter reported through our complaints mechanism, which happened in January 2014.

**What did we do:** According to standard procedures in DCA, a complaints handling committee was set up at the head office in Copenhagen and at the regional office in Phnom Penh. During the investigation the cooperation and financial transactions between DCA and the partner were put on hold. The subsequent investigation into the six elements of the complaint showed that a majority were unfounded or related to management procedures that needed updating. However, a couple were found substantial and appropriate action was therefore taken. The partner organization has taken the complaint very seriously. An employee, who was responsible for recruitment, has been terminated from employment because of the case. An action plan for follow-up on key issues and recommendations from the investigation has been developed and will be monitored closely by DCA. A new policy on financial management is on its way and all new employees have received anti- corruption training in March 2014. The complaint coincided with a planned external audit of the partner organization by another bilateral donor. The report identified no new reasons for concern, but pointed to the partner organization needing to develop and update their financial guidelines. Based on the external audit report and the serious follow up on the case of a partner organization, DCA concluded that it is safe to resume cooperation with the partner in April 2014. The case has incurred no financial or resource-loss on DCA.

**What have we learned:** Efforts to coordinate follow-up and study with other donors are fundamentally correct and important but in this case proved to be challenging due to donors lack of presence in the country and the alleged complaint focus. We did however manage to obtain an audit report from another donor prepared independently of the complaint case, which was useful for the clarification. The complaint and the subsequent process resulted in a fruitful dialogue with the partner and led to some very specific processes and action plans of the partner organization. This shows the importance and relevance of taking all complaints seriously, as also complaints that turn out not to involve actual corruption can give rise to

important dialogues on and improvement of procedures and practices. The setup around the complaints committee was effective and the case could be dealt with in a satisfactory time frame so that both donors, partner and complainant could get feedback in due course

**2014.C02**      **Content of the complaint:** In one of the countries of implementation in Africa, a group of staff members had their cameras confiscated during a walk along the beach. At first, the incident seemed like a burglary, but it was in fact a police officer who had taken the camera. The situation developed in to a case of extortion when the staff members were brought to the police station and fined for taking pictures of children and photographing “strategic areas”. However, there had been no signposting to indicate, that it was an area where photography was not allowed. The fine was negotiated, but in the end, the staff had to pay to be able to leave the police station and get their cameras back.

**What did we do:** The fine was paid out of DCAs own funds and the case was filed in the complaints handling system.

**What have we learned:** The situation was handled as it should be, according to DCAs policy and procedures: the fine was questioned, negotiated and in the end a lower amount was paid than first demanded. Subsequently, the incidence was reported and thereby registered, which allows us to follow up with documentation, should a similar incidence occur in the same police district. Unfortunately, it is impossible completely to avoid a situation like this. The general level of corruption and extortion is high in the country where it happened. But of cause, DCA continuously work to minimize the chances of getting in a similar situation, for example by providing staff and partners training and advice on how to handle these situation, and by signalling that we do not tolerate any form of corruption.

**2014.C03**      **Content of the complaint:** DCA is currently investigating a case of corruption and document fraud committed by one or more local staff members in a DCA regional office. The concerned staff members have been suspended from work while the investigations take place.

**What did we do:** The complaint has been investigation by an external audit company, who has examined all travel statements made since 1 January 2013. The investigation has



revealed fraud to the value of DKK 81,164, of which four members of staff have confessed to have committed fraud to the value of DKK 41,026.

One of these staff members are under suspicion for fraud of the remaining amount, but has not confessed to this part. All four staff members have either resigned or has been dismissed with immediate effect. All donors involved has been informed and funds will be paid back.

**What did we learn:** DCA will in near future look into possible learnings from the case, hereunder if there is a need for increased internal controls. Furthermore, DCA will initiate a review on a sample basis of fuel consumption and procurement procedures in the office.

**2014.C04** **Content of the complaint:** DCA is currently investigating a case of forgery of documentation within a partner organisation in Africa in their efforts to become a partner of DCA, as well as investigating suspicions of continued fraud in the implementation of a DCA-supported project. Further, DCA's possible own role in facilitating the fraud is equally being investigated.

**What did we do:** The suspected case was reported to the complaint handling system and initial investigations were initiated both internally in DCA as well as with the partner under suspicion. Based on the findings of the preliminary investigation, a forensic audit of the partner and the project under implementation will be initiated shortly, and all activities and expenditures of the partner under the cooperation agreement for the project has been stalled. All donors involved have been informed about the suspicion and the ongoing investigations.

**What did we learn:** Once, the investigation has been concluded, DCA will look into possible learnings from the case, hereunder if there is a need for increased internal controls in the engagement with partner organisations.

**2014.C05** **Content of the complaint:** DCA has received a report from a member of staff, who was subject to the extortion by the immigration authorities when entering a country of operations at the onset of a new employment contract. For reasons of administrative character, the employee did not yet have a work permit and had understood that it would not be a problem, but the authorities used this matter to demand an undocumented fine. The employee refused, and asked to see documentation to certify the validity of the fine, but the authorities refused and threatened to put the employee in jail. Faced with that threat, the employee paid the fine (USD 280/DKK 1.669) as requested and subsequently reported the incidence via the DCAs complaints handling system.

**What did we do:** the case was handled according to our anti-corruption policy and will be stored with a view to collect further evidence of extortion or solicitation of bribes and facilitation payments coming from the authority in question. If further evidence can be gathered, DCA will follow up accordingly. The cost has been covered by DCAs own funds, and the employee has subsequently produced documentation on the payment.

**What did we learn:** Situations like these are unfortunately likely to happen to staff in similar situations, and this underlines the importance of training and knowledge about how to handle the situation. The employee in question handled the situation completely correct and according to the outlined procedures.

## **Fundraising in Denmark**

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

Telemarketing was the area of work from which we again received the highest number of complaints in 2014, a total of 15 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

DCA received ten complaints about phone calls asking the donor to increase his/her contribution in 2014. We know, naturally, that loyal donors are irritated by repeated contacts; however, loyalty analyses made by the CEM Institute show that DCA 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 DCAs website.

### **Street Fundraising**

We still receive complaints about street fundraising. In 2014 we had nine 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 DCAs website.

### **Buy aid**

In 2014 we received one complaint about our business cooperation with buy aid. It is a lower number than in 2013. In this case the complainants felt cheated because s/he thought that they supported a humanitarian purpose 100% through their purchase and not with only the 10%, which buy aid donates to DCA. 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 DCA and how much of their donation will go to the humanitarian purpose.

### **The Parish Collection**

In 2014 we received seven complaints about the Parish Collection. The complaints included

- Complaint about a collector who entered a private home without permission
- Complaints about brochures/giros left at the address
- Complaints towards the behaviour of the collector

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**

10 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

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.

## **Organizational matters**

The number of complaints about organizational matters has increased from eight complaints in 2013 to fifteen in 2014.

The complaints in 2014 were, among others, about the following

- Complaint regarding the working environment and wellbeing of the employees in the office of one of our partner organizations
- Complaint about breach of recruitment policy regarding the termination of an employee
- Complaint about dismissal of a volunteer in one of our a second-hand shops
- Complaint that DCA has become a party-political organisation
- Complaint about the behaviour of one of our volunteers in one of our second-hand shop

In 2014 we received some complaints from former staff members regarding the way they had received their dismissal and the way the procedure had been handled. The complaints were taken very serious and all necessary steps were taken to seek clarification regarding the actual steps taken in the specific situations. After going through the different steps it was agreed that DCAs procedure over all had been followed but some adjustments could be added to the way the employee receives the message that he/she has to turn up and receive his/hers dismissal.

These adjustments to the procedure have now been made and an apology has been given to the employees.

In the case related to the partner organization informing DCA about some facts regarding an employee who did not treat the staff very well. DCA made an investigation towards the raised issues in the complaint but were not able to give the person a warning etc. due to the fact, that the person involved, was not remunerated by project money funded by DCA or in any other way related to one of our projects.

DCA also received a complaint from a volunteer in one of our second-hand shops whom we needed to dismiss. DCA investigated the case and spoke with the involved parties. Based on this material DCA decided that due to the facts in the material and the situation in general it had been necessary to dismiss the volunteer.

A complainant found that DCA was a party-political organization because of us working together with a specific organization which the complainant accused of being supporter of extremist political opinions. In our answer to the complainant we explained very clearly why we considered the organization for being neutral as well as we considered our cooperation with the organization as being a very important part of getting distributed most help to as many people as possible being in urgent need.

Another complaint concerned a volunteer in one of our second-hand shops. The complainant felt that he/she had been treated badly in the shop after having handed in some things, which she found in a good condition. Later she was told, that the volunteer who had received the things had been talking bad about the condition of the things to another person whom the complainant knew. After the complaint had been filed it was clarified towards all the volunteers in the second-hand shop that DCA would not tolerate that kind of behavior and DCAs rules regarding confidentiality regarding who and what has been donated were repeated to the volunteers.

### **Part 3: Maintenance and quality assurance of the complaint handling system during 2014**

It was the goal of 2014 that all the DCA offices should have a well-established and functioning complaints handling system. In terms of our regional offices the goal was achieved, but unfortunately we only managed to set a complaints handling system up in three of our HMA offices which means seven are still missing. To manage getting a complaints handling system set up in the last four HMA offices will be a priority in 2015.

The year 2014 was also the year, where we managed to develop a comprehensive guideline. The guideline is seen to be a tool for the DCA staff in general to find out how to handle a complaint in an open, transparent and effective way. But it is also meant to be a help to our regional offices, HMA offices and our partner organizations in the situations where they need to establish a complaints handling system and understand the purpose of doing so.

It is the responsibility of DCA to make sure, that we give the required information and training to our employees and partners in a way which makes them understand our obligations and minimum standards in regard to our complaints handling system. This is also how DCA as an organization can demonstrate our responsibility in a transparent way to our stakeholders, donors and the ones receiving our assistance.

The final draft of the guidelines were presented to our regional offices at an IMM meeting the 3<sup>rd</sup> of February 2015.

The goal for 2015 will be to establish complaints handling systems in the last of our HMA offices with projects running for more than 12 months. At the same time DCA is required to ensure that the partners we are working together with have complaints handling systems, and if they don't DCA has the obligation to provide the help needed to establish a functioning complaints handling system. This is necessary to ensure the transparency and accountability which we represent as organization.

#### **Part 4: Reporting on DCAs work on anti-corruption in 2014**

2014 was the second year of implementing the internal project on anti-corruption which DCA launched in 2013 and the project will be running until the end of 2015. The aim of the project has been to ensure that DCA meets the international standards of anti-corruption, but even more important it has contributed internally to a change in the culture how we as organization approach and speak about corruption. The goal for DCA has been to strengthen a culture of openness and dialogue where anti-corruption and the dilemmas which often follow is something we talk about – even when it is not motivated by any concrete suspicion. In DCA we believe that the more open we are about corruption, and the more we can talk about the specific dilemmas, the better we will become to oppose and fight it, also in the countries where it almost seems as corruption is built into the system itself.

Our colleagues and employees are daily facing difficult choices when it comes to anti-corruption. Is it more important to say no than to pay a small bribe of 5 USD than it is paying for getting a truck with relief aid to a refugee camp? And what about the urgent need for travel and working permits – is it okay paying 20 USD under the table in order to get them as fast as possible through the system? And what if I just pay someone else to make sure that all the arrangements will be going through the system, is it still my responsibility if what he/she is doing is falling under the category of bribery?

There are both doubts, dilemmas and grey areas involved when talking about anti-corruption and this is what we would like to support in DCA, we want our employees to talk with each other and with our partners about these things. It's easy to say: "We say a 100 % no to corruption and we don't accept it". It is just not certain that this will help us in dealing with the cases in the specific situation – and even worse it will not be a transparent system and the money will in the worst case scenario be hidden in people's private economy. For these reasons we decided to create an anti-corruption action plan containing different elements such as:

1. A clear policy stating that we do not tolerate any forms of corruption.
2. A anti-corruption advisor at Headquarters and a local anti-corruption focal point in each country programme. The focal point has taken an anti-corruption course and is working closely with the local management and is responsible for rolling out the training and being in charge of the dialogue between the local office and their partners. The local focal points receive sparring from the anti-corruption advisor in HQ in Copenhagen on a regular basis and can always take contact to the advisor if support is needed.
3. An online anti-corruption course was launched in December 2014, and has been completed by almost 100 % of the existing DCA staff. It has also been decided that the course will be mandatory for all new employees, who must take the course in the first 3 months of their employment in DCA. In 2015 the course will be translated into French and Arabic maybe more languages. Until now the language barrier has been solved with the help from colleagues who have been taking the course together with other english speaking colleagues who have been currently translating while taking the course. We have seen a fantastic result with almost a 100 % implementation rate in our offices.
4. The on-line course can not stand alone when wishing for an open and dialogbased anti-corruption culture, therefore the course has to be followed up on a regular basis with invitations to attend dilemma workshops - both virtually and in person. The idea behind our plan is that the emplyee/local forcal point will attend a workshop after having completed the course. During this workshop the participants will be discusssing concrete dilemmas and be working with the specific principles and guidelines which has been taught during the on-line course.
5. All the local focal points at the regional offices have designed anti-corruption plans for 2014-2015. The plans contain specific measures for training internally, but they also have a focus on how to involve our partners in our anti-corruption work. The plan made by DCA also contain a description of how DCA will be able to cooperate with other actors in the anti-corruption area. The goal for

2015 is to manage getting a minimum of two of our partner organizations to develop an anti-corruption policy before the end of the year.

DCA has had its anti-corruption policy since 2009, but there has been an overwhelmingly positive response to bringing the policy more into action by launching the online course, which is dilemma based and therefore confronts some of the difficult choices we have a possibility to be standing in on a daily basis. Many of our employees have reported that they found it very giving to take the on-line course since the course has been a help to guide them through their doubts regarding corruption and they are looking forward to the follow up courses/workshops. At the same time we have received concrete stories from people who have been able to avoid corruption after taking the course, because their knowledge of corruption after taking the course made them more prepared to step up against it. It is possible to read one of the stories on our webpage under the title: "The fight against corruption". The next step for the anti-corruption focal points and advisors will now be to get the partners engaged in the training and development of their own policies and action plans.

There has been registered a small increase in the number of complaints received through our complaints handling mechanism, which we see as a positive sign, as it is a sign of an increased awareness and knowledge of how to respond to these cases. The hope is that we will see a significantly raise in 2015, which is supported by increased efforts to spread the information and knowledge about our complaints handling systems in the different offices and at headquarter.