



Complaints Report 2015



DanChurchAid Complaints Report 2015

This is DanChurchAid's (DCA¹) seventh Complaints Report. The report covers the calendar year 2015 and is available at the DCA website together with all the previous Complaints Reports from 2009, 2010, 20011, 2012, 2013 and 2014.

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 in 2015.

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 2015.

Part 1: General information

From 1st of January to the 31st of December 2015 the office in Copenhagen received 55 complaints. This is a decrease compared to 2014, where we received a total of 72 complaints. There is thus in 2015 received 17 less complaints than in 2014.

The complaints are of both sensitive (15) and operational (40) character and include our Danish as well as our international activities.

¹ 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 2015 has been status quo compared to the number of sensitive complaints in 2014. The number of cases related to corruption have developed from being 11 cases in 2010, 1 case in 2011, 8 cases in 2012, and 7 cases in 2013, 14 cases in 2014 and 7 cases in 2015. 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. This has now been an integrated part of the recruitment process and all new employees are ask to take the course in about the first 3 months of their employment. In 2014 the total number of corruption cases was 14 out of the 15 incoming sensitive complaints. In 2015 8 out of the 15 sensitive cases where related to corruption (one of the 8 cases turned out not to be categorised as corruption due to the fact that it turned out to be an unjustified suspicion about corruption). The last 7 sensitive complaints where related to staff internally in DCA or within our partner organisations.

The operational complaints (40) 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 29 complaints by people who has been asked to increase their contribution.

We still receive complaints about our street fundraising, which in 2015 amounted to three 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. 130,000² 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.

² 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.

Oversigt over klage typer

	2012	2013	2014	2015
Total number of complaints received in Copenhagen	94	60	72	55
Number of sensitive complaints thereof	<u>8</u>	<u>8</u>	<u>15</u>	<u>15</u>
Number of operational complaints	86	52	57	40
Number of tele-marketing thereof	20	17	15	13
Number of street fundraising thereof	11	7	9	3
Cancellation of donations and complaints about technicalities	13	13	10	13
Complaints about the parish collection	6	4	7	6
Complaints about buy aid	3	3	1	0
Complaints about organisational matters	53	44	42	35

Transparency by publishing corruption cases

The 2015 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 and 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 2014 we received 15 in this area whereas we received 5 in 2015.

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

Published cases in regard to corruption from 1st of January 2015 till 31st of December 2015

2015 – C01 Fraud committed by the police

Content of the complaint: DCA received a report from one of our local anti-corruption focal points which described a situation where a convoy from one of our programmes got stopped at a check-point on its way to the airport to fetch some expats. The police officers asked to see the survey report of the vehicle, which unfortunately was 4 days too old and should have been renewed, besides this, the vehicle was missing wind shield wipers and the back lights of the car did not work. The police demanded a fine off 110 USD for the faults of the car. Due to the fact that the hour was close to midnight and the fact that they had to be at the airport around 1 am, the staff in the convoy decided to pay without engaging in any further discussion with the police. They did not receive any receipt and have afterwards produced their own documentation.

What did we do: The staff member handled the situation in the correct way according to DCA policy.

What did we learn: These situations are unfortunately likely to happen in this specific country, and it emphasizes the significance of training and knowledge about how to handle these kind of situations.

2015 – C02 Breach of the Code of Conduct and suspected fraud by employee

Content of the complaint: DCA received a complaint from one of our anti-corruption focal points informing us about how a DCA staff had paid children to carry some bottles of oxygen from one side of a boarder to the other side of the boarder to load them on one of DCAs vehicles. After this he bribed the police at the boarder control. Besides the fact that using children for work is a breach of our Code of Conduct the reported amount of the bribery was so high that there was a serious suspicion that the staff member had acted this way out of personal gain. It was not the staff member that reported the incident him/herself but it was discovered by one of the financial managers.

What did we do: The staff member was confronted with his/her actions and short after the confrontation he/she quit his/her job while the case was still under investigation. The case was handled according to our anti-corruption policy and will be stored in order to gain material and evidence to help us to fight bribery and fraud in general, and also in order to gain something in one's own interest. The costs in regard to this case was covered by DCA own funds and has been documented in regard to DCAs own internally procedures.

What did we learn: These situations are unfortunately likely to happen in this specific country, and it emphasizes the significance of training and knowledge about how to handle corruption and situations of extortion to try to avoid similar situations in the future.

2015 – C03 - Serious contractual irregularities with partner DRI in Uganda

Content of the complaint: DanChurchAid has investigated and found evidence of forgery of documentation within the (now former) partner organisation Development and Relief Initiative – Uganda (DRI) in their efforts to become a partner of DanChurchAid, as well as investigated and found continued, serious irregularities in the implementation of a DanChurchAid-supported project. Further, DanChurchAid's own role in facilitating the fraud was investigated, in which regard serious negligence was detected.

What did we do: The suspected case was reported to the complaint handling system and initial investigations were initiated both internally in DanChurchAid as well as with the partner under suspicion. Based on the findings of the preliminary investigation, an external forensic audit of the partner and the project under implementation was carried out. The forensic audit confirmed the fraud, based on which the project was closed and the cooperation agreement between DanChurchAid and DRI was terminated, and all project assets returned to DanChurchAid. All donors involved have been informed throughout the investigations and the case has subsequently been submitted to the police authorities. The DanChurchAid staff responsible is no longer working for the organisation.

What did we learn: Following the case, DanChurchAid has revisited its procedures and enhanced the internal controls in the engagement with partner organisations.

2015 – C04 – SUSPECTED IRREGULARITIES IN HMA-COUNTRY

Content of the Complaint: In connection to a routine check of project funding, DCA has become aware that a small amount of funding for a project in one of our Humanitarian Mine Action Programmes, has not gone into funding the intended activities. The amount of were transferred to a partner organisation, but using procedures that were not according to our guidelines and standards.

What did we do: DCA tried in every possible way to get the funds back, but did not succeed. The case has been closed and the lost funds accepted by DCA and paid by own funds.

What did we learn: DCA has taken steps to ensure that this cannot happen again, procedures for transfers have been re-addressed.

2015 – C05 – Suspected fraud by staff in partner organisation

Content of the complaint: The suspicion has arisen during the partner's financial reporting as the partner had included accountabilities dating a few years back. A thorough look at these accountabilities by DCA finance unit in the regional office raised several questions about the validity of the accountabilities, which the partner failed to explain adequately at a meeting between DCA and the partner. Subsequently the audit looked into the mentioned

accountabilities and found that there were strong indicators of fraud. DCA expects that the irregularities may have been created by one or two staff, and hence as such are not believed to be institutional fraud.

What did we do: DCA has asked the partner to investigate it internally and report back to DCA within a set timeframe. Until then, all project assets, funds and activities have been temporarily suspended/halted.

What did we learn: Learnings will be gathered when the case is concluded.

2015 – C06 – Extortion of manager in partner country

Content of the complaint: During a field visit to one of DCAs partners the regional manager was driving and stopped by a police officer. The police officer insisted that the manager had been passing at red light, but the manager wasn't aware and couldn't reconstruct the situation to be true. The police officer insisted and said he would have to take the manager to the police station to deposit his car and that he had to appear in Court next week, where he would be sentenced to pay a fine of USD 500. The policy officer was acting in a threatening way, and suggested that the manager paid him 100 USD to get out of the situation. Feeling threatened and unsafe, the manager decided to do so. Subsequently the incidence was reported to the Police, who by identifying the numberplate of the police officers car, informed the manager that the car in question was in fact not belonging to a police officer.

What did we do: The case was reported to the police and we are following up. Unfortunately, cases like these do not very get investigated properly.

What did we learn: We have learned that bribe by people pretending to be police officers is common. Always insist to have police officers to present ID and document that they are police officers.

2015 – C07 – Extortion and theft of \$900

Content of the complaint: During a work-related travel, a DCA staff was carrying \$10,000 in cash for DCA, as DCA did not at that time have a bank account set up in the country of

destination. Whilst going through the last security checkpoint in the airport to the departure lounge and having put his bag and pocket contents through the scanner he was pulled to the side for a search. He was then asked a lot of questions, while his bag was searched, upon which the security officer found the cash hidden in the bag. Communication was troubled by the language barrier, but the security officer communicated that it was illegal to carry that much cash, and that it had to be declared. The passport was taken from him and the money confiscated. The DCA employee protested and brought a lot of attention to his situation, while also fearful of drawing too much attention from the other passengers which could result in him being targeted for robbery as it was late at night. He then agreed to declare the cash, but was then told that now the cash had been confiscated. There was by now many others passing through the scanner and the security officer was getting agitated and covered the contents of the DCA staff's bag and monies and stated to him: "coffee for me". The DCA staff member instantly knew what that meant, it was a beckon to a bribe, having had recent runnings with the corrupt police force in the country of departure and fearing that this was going to escalate in to something bigger and to save losing the whole amount, He agreed to pay. The security officer then took an amount from the stack of cash and the DCA staff member was free to proceed. However, on arrival he discovered that \$900 was missing from the original amount.

What did we do: The case was handled according to our anti-corruption policy and was reported to the complaints handling system in DCA. The staff member has subsequently produced documentation on the payment.

What did we learn: The staff member handled the situation in the correct way according to DCA policy, the staff member questioned the behaviour of the security officer, tried to negotiate his way out of the situation and was able to get out of the situation before it escalated.

These situations are unfortunately likely to happen in this specific country, and it emphasizes the significance of training and knowledge about how to handle corruption and situations of extortion. DCA have been able to set up a bank account in the country after the incident and thus can avoid this kind of situation in the future.

Fundraising in Denmark

Telemarketing activities (phoners)

Telemarketing was the area of work from which we again received the highest number of complaints in 2015, a total of 13 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

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 DCA's website.

Street Fundraising

We still receive complaints about street fundraising. In 2015 we had three cases. In two out of the three cases it was parents calling and complaining about their child who had agreed on signing up for a monthly contribution.

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.

The Parish Collection

In 2015 we received six 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

In 2015 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

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 organisational matters has decreased from 15 complaints in 2014 to 5 in 2015.

The complaints in 2015 were, among others, about the following

- Complaints about a submitted offer in connection with a specific task landed in the Country Offices junk mail box, and was therefore not assessed together with the other offers.
- Complaint about the behaviour of one of our volunteers in one of our a second-hand shops
- Complaint in regard to the food distribution done by one of our Partner organisations.

- Complaint in regard to the way a dismissal procedure was handled in one of our Country Offices.
- Complaint from one of our partner organisation because of the lack of response from our Country Office.

In the case in regard to the procurement offer, which was received on time but just not discovered a dispute settlement was made between the bidder and DCA. DCA learned from this incident always to be aware of checking the junk mail before closing a procurement offer.

In regard to the complaint from the partner organisation which lacked response from our Country Office it turned out to be a misunderstanding between the Country Office and the partner organisation. This complaint underlined the importance of clear and timely communication and response between both our partners and us.

DCA also received a complaint from a customer in one of our 2nd Hand Shops who had overheard an inappropriate conversation between the staff at work that given day. The staff was confronted with the incident and were told that it was unacceptable behavior in the case it had actually taken place. The staff involved agreed on this and apologized.

One of the complaints filed in 2015 was from one of our Country offices and had focus not only on the complainants own dismissal but also touched on some points in regard to the way some of the complainants colleagues had been treated in the way they had been dismissed. DCA investigated further on each of the dismissals which the complaint touched upon and had to agree that some of the actions taken could have been done in a nicer and more thoughtful way. DCA has to more aware of the need of comprehensive, clear and regular information during a period where all the people implied in a dismissal situation are very vulnerable a situation which specially has to be addressed to the respective leader who has to handle these situations.

Finally DCA received a complaint in which the complainant claimed that one of our partners favored certain groups and ethnicity when distributing food. DCA investigated the complaint and were in touch with our partners but found no evidence what so ever in regard to the contents of the complaint.

Part 3: Maintenance and quality assurance of the complaint handling system during 2015

The goal for 2015 was to establish functioning complaints handling mechanisms in the last of our HMA offices which were still missing, and which have funding enough to run projects for more than 12 months. We are still working on this. As organisation DCA is obligated to ensure that we continuously work on helping the partners with whom we work together to establish functioning complaints handling mechanisms. This is needed to keep being the transparent and responsible organisation as we are, and is an ongoing task for DCA.

In 2015 the amount of partners who were only working with humanitarian projects and development was 217 against 205 in 2014. The number is seen in the light of partners who are exclusively involved in our HMA programmes. The raise of the numbers of partners are because of our new country programme in Zimbabwe. By the end of 2015 it was reported that 93 of our partners had established complaints handling mechanisms which amounts to 43 %. This is a decrease from 2014, where the number was 48% who reported that they had established functioning complaints handling mechanisms (in total 99 partners out of a number of 205). Probably the reason for the fall of numbers is because of changes in the portfolio of the partners due to strategic changes etc. On top of this explanation comes new partners in Zimbabwe, of whom none have established complaints mechanisms yet.

Indrapportering på henholdsvis antallet af partnere med oplyst fungerende klagemekanismer

Partners, with ScoC (Staff Code of Conduct) and Complaints Handling Systems Based on reporting in ACR's (Annual Country Reports) and Humanitarian Country Reports in 2014 + 2015

Country	No of partners		Partners with Staff CoC		Partners with Complaints mechanism	
	2014	2015	2014	2015	2014	2015
<i>Kyrgyzstan</i>	18	18	10	10	10	10
<i>SARO: Nepal Bangladesh India Pakistan</i>	38	44	28	16	19	16
<i>Cambodia</i>	27	22	20	15	5	5
<i>Myanmar/Thailand</i>	20	18	14	10	5	4
<i>Palestine/Israel</i>	17	14	13	10	9	7
<i>Ethiopia</i>	14	13	9	10	10	10
<i>South Sudan, Kenya and SK</i>	18	17	18	12	7	8

<i>Uganda</i>	20	17	14	12	12	14
<i>Malawi</i>	21	22	18	22	19	16
<i>Honduras</i>	17	15	0	1	0	1
<i>Zimbabwe</i>	n/a	13	n/a	0	n/a	0
TOTALS	198	213	158	118	96	91
HRU Countries						
<i>Syria</i>	3	1	0	0	0	0
<i>Lebanon</i>	2	1	1	1	1	1
<i>Darfur, Sudan</i>	1	1	1	1	1	0
<i>Philippines</i>	1	n/a	1	n/a	1	n/a
<i>Jordan</i>	n/a	1	n/a	1	n/a	1
TOTALS	7	4	3	3	3	2
GRAND TOTAL	205	217	161	121	99	93

Indrapportering på operationelle klager fra vores udekontorer i 2015

ETHIOPIA:

- 1) Please fill in the table below on your complaints handling (please note this is **only** about operational complaints. Sensitive complaints are handled by HQ in line with DCA's Guide on Complaints Handling and should not figure here):

No of operational complaints received	No of complaints closed	Broad description of type and content of complaints	Follow up measures taken and lessons learnt
One	One	The reference check done by DCA was not professional, DCA requested people that the one involved had not put as a reference and that slightly knew to be a witness of his/her performance.	Verbal explanation was given by the chair of complaints handling committee. The lesson learnt was that we need to consult the one involved if we are going to take a reference from someone else than the ones given by the applicant

UGANDA:

No of operational complaints received	No of complaints closed	Broad description of type and content of complaints	Follow up measures taken and lessons learnt
1	1	Operational complaint related to a procurement process of a larger	The complainant did not accept the GLRO handling of the complaint and complained further to HQ.

		consultancy – the bid ended up in the spam box of the prolog officer and hence was not assessed.	Follow-up: at GLRO we have established an email address specific for bids, applications etc.
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MYANMAR

- 1) Please fill in the table below on your complaints handling (please note this is **only** about operational complaints. Sensitive complaints are handled by HQ in line with DCA's Guide on Complaints Handling and should not figure here):

No of operational complaints received	No of complaints closed	Broad description of type and content of complaints	Follow up measures taken and lessons learnt
1	1	Fraud at partner organisation, money was taken by a person or personal purpose.	The amount of Money was transferred by DCA to partner organisation (in a personal account) without following required procedures. The person whose account it was transferred to took out the money and misused it. DCA took steps to recover the money and have emphasized strict procedures in regard to transferring money to partners to avoid this can happen again.

PALESTINE

- 1) Please fill in the table below on your complaints handling (please note this is **only** about operational complaints. Sensitive complaints are handled by HQ in line with DCA's Guide on Complaints Handling and should not figure here):

No of operational complaints received	No of complaints closed	Broad description of type and content of complaints	Follow up measures taken and lessons learnt
One Complaint Received late 2015	None	A contract of a person was suspended and then stopped due to an amount of some complaints handed in by other beneficiaries etc. This raised a following complaint which is still open and being investigated.	The case is still open and the following measures were/will be taken: 1. Contacting the partner organization and informing them about the complaint and sending them several relevant questions to better understand the case. 2. Collecting documentations relevant to the suspension and ending of contract.

			<p>3. Collecting thorough documentations for the way the partner organization has handled the complaints received.</p> <p>4. Organizing the different events, that occurred during the period since the complaints were submitted.</p> <p>5. Informing a co-funder of this project about the case as it involves some concerns relevant for the Partner organisation to know when decision needs to be made.</p>
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Part 4: Reporting on DCAs work on anti-corruption in 2015

In 2015 DCA continued its ambitious work in the area of anti-corruption. All DCA staff went through the year an e-learning course about anti-corruption which is now imposed as obligatory on every new staff member of DCA whom has to take the course in about the first 3 months of their employment.

Many of DCAs implementing partner organisations are also offered access to the course and many have used this opportunity. Our anti-corruption focal points have also held trainings and workshops on the topic during the year 2015 – both for partner organisations and own colleagues. During the course a thorough examination of the policy and the different rules, regulations and discussions of the different dilemmas and ways to act upon them are discussed in the light of anti-corruption.

In more and more countries anti-corruption has been a specific topic for the yearly meetings with our partner organisations and in some of the countries a special focus has been made on a dialogue trying to make it possible to develop further policies and procedures in this specific area. I 2015, 25 partner organisations developed a policy on how to fight corruption and even more managed to get a complaints handling mechanism in place. In total a number of 120 partner organisations received training by DCA in the area of anti-corruption.

A good example can be seen by following this link:

<https://www.noedhjaelp.dk/artikler/til-kamp-mod-korruption>