



DanChurchAid

Complaints Report 2020



DCA Strategy and Quality Management Unit

May 2021



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Abbreviations

AIP – Accountability Improvement Plan

CC – Complaints Committee

CAR – Corrective Action Request

CD – Country Director

CHS – Core Humanitarian Standard

CO – Country Office

CoC – Code of Conduct

DCA – Dan Church Aid

DoC – Declaration of Confidentiality

FAFPI – Fight Against Facilitation Payment Initiative

FP – Focal Point

HQ – Head Quarter

IFU – International Finance Unit

LLAB – Learning Lab

LLA – Listen Learn Act

MEAL – Monitoring Evaluation and Accountability and Learning

MFA – Ministry of Foreign Affairs

OBS – Observation

PDM – Post-Distribution Monitoring

PSEA – Prevention of Sexual Harassment and Abuse

SoC – Subject of Concern

SoP – Standard Operating Procedure

SQM – Strategy and Quality Management Unit

ToR – Terms of Reference



1. About the report

DanChurchAid (DCA) continues striving towards a high level of transparency and accountability. To achieve this objective, a central commitment in DCA's work, is the aspect of "learning." Learning from other organisations and stakeholders within and outside the sector, as well as learning from external reviews of the organisation, such as the Core Humanitarian Standard (CHS) re-certification audit and UNICEF PSEA Self-Assessment. Finally, as part of closing the loop when handling sensitive complaints, DCA considers what has been learnt from each case, and implements measures to minimize the risk of the same situation to re-occur.

DCA has developed yearly Complaints Reports for the past 16 years. The first reports only mentioned the corruption cases that had been handled, but since 2008 the reports have become more detailed and outlines initiatives taken within both the areas of accountability- and the complaints system and goes through each complaint that has been handled.

This report presents some of the key areas DCA has been working with in relation to the Accountability- and Complaint's system during 2020. The report also gives an insight into the number of operational complaints received in the organisation and their categorization in Denmark. Finally, the report presents the sensitive complaints received in DCA's complaints system.

Sensitive complaints related to corruption are described in detail, however without mentioning any names nor countries. For protection reasons, complaints related to DCA's Code of Conduct (CoC) and its related protection policies, "Prevention of Sexual Harassment and Abuse (PSEA)" and "Child Safeguarding," are only mentioned overall and very briefly.

2. Focus-areas from 2020

In the Complaints Report from 2019, the below activities were planned to be executed throughout 2020. However, due to the COVID-19 pandemic, several of the activities have either been cancelled, postponed, or facilitated in different ways than planned. Below each activity, is a brief update on what has been carried out in 2020.

a. Continued focus on reaching beneficiaries with information about expected staff behavior and the access to DCA's complaints mechanism.

- Each Country Office (CO) has developed an Accountability Improvement Plan (AIP). The AIP translates the commitments from the CHS into a workplan for the CO to keep track of their implementation and performance in this regard. Through the quarterly Accountability- and Complaints Focal Points webinars, the plans have been reviewed and discussed. However, the challenge of reaching beneficiaries with information on expected staff behavior, came up in the recent Re-Certification Audit as a focus area that DCA still needs to work on in 2021.

b. Focus on the interlinkage between the M&E processes, feedback, and then the complaints mechanism. This will also be a focus area for the next face-to-face workshop for CHS Focal Point persons.

- During the Accountability, Complaints and MEAL Workshop in Addis in 2019, Post-Distribution Monitoring (PDM) activities were identified as a possible mechanism to integrate Listen Learn Act (LLA) into MEAL systems. Due to the COVID-19 pandemic, the workshop in 2020 was cancelled. However, the Senior MEAL Advisor (SQM Unit) has drafted a MEAL Policy. The policy includes an area relevant to accountability, where feedback systems and LLA will be part of the broader DCA MEAL approach.



- Recently SQM has recruited a Humanitarian MEAL Advisor, who will also be tasked taking this forward.
- DCA's CO in Kenya has worked in a strategic manner with LLA and interesting reports on the initiatives have been shared with the complaint's focal points in the COs for inspiration and learning.

c. Contributing to strengthened collaboration with the ACT agencies that DCA co-implements within various forms.

- DCA is a member of the ACT Alliance and the CHS Alliance. Due to COVID-19, several face-to-face meetings have been cancelled throughout the year. However, the yearly CHS Workshop was conducted online and both the DCA Complaints Advisor and the Compliance Coordinator attended. The following was presented and discussed:
 1. Launch of the Humanitarian Accountability Report
 2. Launch of the updated CHS PSEAH index- and handbook
 3. A range of workshops on topics the CHS aims to improve, these included complaint mechanisms, implications for accountability due to COVID-19, duty of care, inclusion and safeguarding and more.

d. Strengthening DCA's annual reporting on non-sensitive complaints at both Head Quarter (HQ) and Country Office (CO) level.

- Reporting of non-sensitive complaints at HQ and COs is included in the annual country programme report and reflected in DCA's International Report 2020. DCA is also looking at how to improve processes, monitoring and learning from non-sensitive complaints in both HQ and COs.

e. Strengthening DCA's annual reporting on the partner implementation of complaints mechanisms.

- Reporting of complaints systems at partner level is included in the annual country programme report. The number of partners that have complaints systems in place is now more accurate compared to the 2019 reporting.

3. Responding to external assessments, reviews, and audits

Continuing the trend of 2019, an increasing number of international donors have been requiring NGO's to apply strong safeguarding measures. DCA has gone through various assessments- and audits of its Accountability and Complaints practises.

3.1 UNICEF PSEA Self-Assessment

In the second quarter of 2020, DCA went through a UNICEF PSEA Self-Assessment. The assessment gives a baseline for tracking progress of the organisational capacities on PSEA. These standards are aligned with the United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners.

During the assessment it was concluded that DCA does not provide sufficient PSEA training for temporary consultants and that the adoption referral mechanisms are not adequate. As a response, DCA developed a referral pathway as well as adopted detailed investigation guidelines from the CHS Alliance.

DCA scored a satisfying result, which means "PSEA organisational capacities are adequate and SEA risks are low". A PSEA Toolkit was provided as a resource to be used in conjunction with the assessment to improve systems on SEA prevention, in policies, procedures, and systems on PSEA.



3.2 CHS Audit Cycle

Since DCA initiated the CHS Audit Cycle in 2016 DCA has made special efforts, after each audit, to address gaps identified by the external auditors who have conducted the audits of DCA.

The result from the Maintenance Audit (December 2019 – January 2020) was positive, as DCA received only one observation (OBS) and closed the one remaining Corrective Action Required (CAR) on data protection. DCA therefore maintained the CHS certification. The auditors stated that DCA has undertaken continuous efforts to achieve a high level of compliance with their indicators on complaints. They specifically noted the following:

- A workshop was held in Addis Ababa to build the capacity of Accountability and Complaint focal points and to exchange best practices within the areas of CHS, PSEA, complaint handling, and anti-corruption.
- The compliance coordinator and complaints advisor updated the Accountability Improvement Plans (AIP) together with the focal points.
- The responsibilities and roles of the Accountability and Complaint focal points were updated.

To address the one remaining observation on complaint mechanisms, the annual country programme reporting template for 2020 was updated to include number of local partners that have a complaint handling mechanism.

The result of the audit provided a good foundation for the Recertification Audit that run from the third quarter 2020 to the second quarter of 2021. The results of the recertification audit will be reflected in the Complaints Report of 2021.

3.3 ECHO and USAID

Additional activities to improve the transparency and accountability in DCA were made when the ECHO ex-ante audit pointed out a requirement to develop the Declaration of Conflict of Interest to the DCA Board, Council and Senior Management and ensure all relevant members and employees to sign. The decision to make it mandatory for DCA Board and Council members to sign the DCA Code of Conduct was another step towards increasing the level of organisational engagement towards accountability.

When DCA signed a contract with USAID for a project in Cambodia, a Trafficking in Persons Compliance Plan was developed to meet the donor's requirements, and the contract with USAID was signed accordingly. The Trafficking in Persons Compliance Plan was presented at a Complaints- and Accountability Focal Points Webinar, for further implementation at the CO's as well as shared with all relevant employees at HQ and COs.

4. Sector- and cross sectoral networks

The yearly CHS Workshop was held online and both the DCA Complaints Advisor and the Compliance Coordinator attended. Throughout 2020 DCA has continued the collective action initiative FAFPI (Fight Against Facilitation Payment Initiative) together with the Danish Ministry of Foreign Affairs, the Danish Confederation of Industries and several other cross sectoral organisations and companies.

DCA has taken an active role in driving this initiative forward from idea to reality since it was first initiated by Danfoss and the Danish Ministry of Foreign Affairs. DCA sees this as a key initiative in fighting facilitation payments, since it is difficult for individual organisations to address on their own and because collective action adds more value. FAFPI member organisations collect evidence for challenges related to facilitation



payments and to create awareness within the Danish Ministry of Foreign Affairs and eventually to gain support for confronting and preventing facilitation payments in the future.

DCA also reports and registers these cases so it is possible to follow up with the authorities in question where cases are a recurrent problem for our employees and programmes. Due to the COVID-19 pandemic, face-to-face meetings have been cancelled in 2020 and replaced with online meetings. The group has worked on a concept for defining the role of FAFPI which includes the establishment of a reporting system, training toolkit and procedures for getting new members. In the second quarter of 2021, a webinar to launch FAFPI and to get more members, will be organised.

5. Yearly Complaint Report

DCA commits itself to writing the yearly complaints report. DCA considers the report as an important initiative in continuing a high degree of transparency and learning, and because DCA believes this is one of several important ways to fight misconduct and corruption.

DCA does not publish names of individuals who bring forward complaints or who are witnesses, investigators, or decision makers in the process of handling a specific complaint.

For protection reasons, complaints related to DCA CoC and related protection policies (PSEA, Child Safeguarding), are only mentioned overall and very brief. DCA's intention is that the reader of this report will gain an understanding of how DCA handles each case with diligence, as well as constant efforts to ensure that every donation DCA receives is used for its intended purpose, and that everyone entrusted with a position of power in DCA is aware of our values regarding expected staff behaviour and CoC.

Each year, a member of the DCA board, in his role as a designated focal point relating to the complaints system, randomly selects several sensitive cases and conducts a quality assurance of the process and decisions made during the complaints handling. Through this board-led self-assessment of DCA procedures and complaints handling, DCA strives to ensure that complaints are dealt with diligently and according to the values of the organisation. This is an attempt to keep DCA accountable towards itself, the people that the organisation work with, and those who support DCA.

6. Complaints received in 2020

DCA requires that its partners have their own complaints systems, anti-corruption policy, code of conduct and protection policies in place, or alternatively that they refer to DCA's Framework until they have established their own. The partners are strongly encouraged to put these measures in place and are offered capacity strengthening support to ensure this. It is DCA's goal that most partners eventually will have a complaints system in place, and the SQM Unit is working closely with the Complaints- and Accountability Focal Points in the CO's to achieve this.

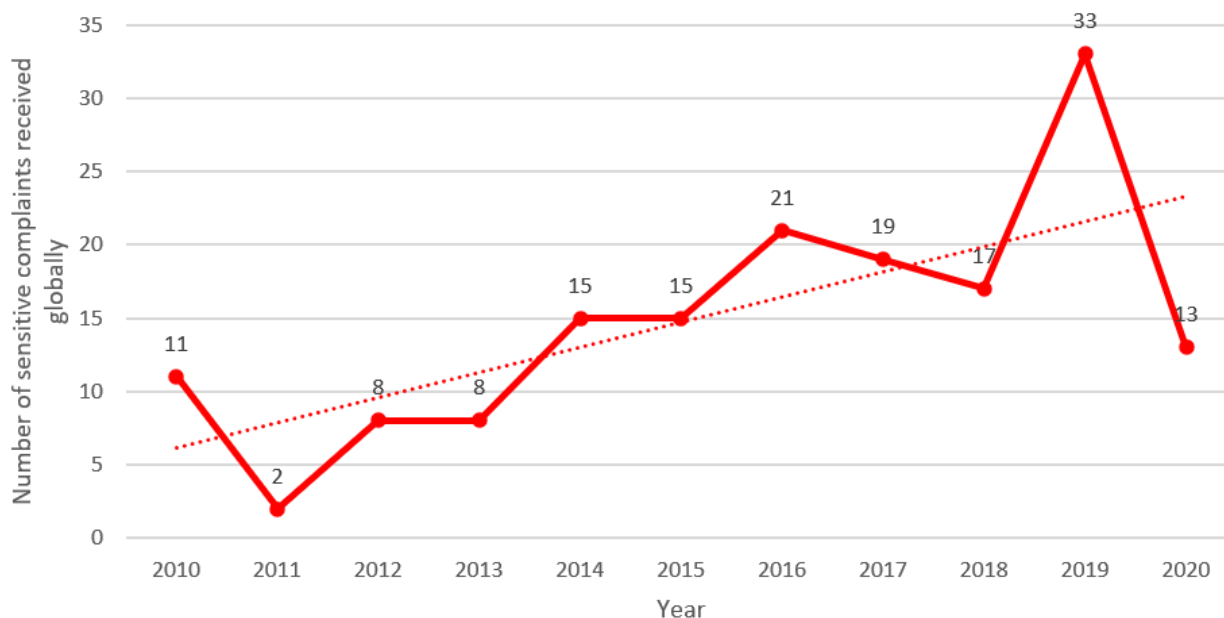
6.1 Complaints systems and complaints received globally

142 partners out of 205 partners had complaints systems in place in 2020, which is equivalent to 69% of all DCA's partners. This is an increase of 10% from 2019, where 59% (115 out of 195) of DCA's partners had complaints systems in place and seen as a positive development.

A total of 2592 complaints were received globally, of these 2579 were categorized as non-sensitive and 13 categorized as sensitive complaints of which 11 were handled in collaboration with HQ Complaint Committee (CC) and two were handled by DCA COs. Out of the 13 sensitive complaints received 7 were related to corruption and 6 related to breach of DCA's Code of Conduct and (sexual) harassment. DCA



experienced a decrease in the number of sensitive cases received in 2020 compared to 2019 where the number was 33. See figure below.



Receiving complaints is seen as a positive indication that stakeholders trust DCA with their grievances, on sensitive issues. However, considering the contexts in which DCA staff and partners operate, there might still be a possibility of underreporting, it takes courage to file a complaint. A rising number of cases over the last 10 years is seen as an indication of success in the way the complaints systems are communicated. Learning is extracted from the individual complaint's cases, which assists DCA in improving management of complaints and in avoiding repeatable mistakes.

Out of the 13 sensitive complaints, 6 were related to alleged or suspected breaches to DCA's staff code of conduct and underlying policies. Almost all these cases are highly sensitive for the persons involved. DCA does not report publicly on these cases out of respect for the safety and legal rights of those involved. The general breakdown of the cases is as follows:

Four complaints involved the behavior of DCA staff which constituted minor breaches of DCA's staff CoC or other underlying policies and were not related to sexual misconduct. The cases were duly investigated. Three of the four cases were however concluded as not substantiated. The fourth case was substantiated and disciplinary actions against the Subject of Concern (SoC) was taken accordingly.

Two complaints involved suspicion of sexual misconduct (harassment, exploitation, or abuse). One was related to DCA's own employee, but based on the findings of the investigation, not substantiated. The other case was related to an employee of a partner organisation. The case was investigated by an external investigator based in the region. As the SoC worked for another organisation, actions were taken against him through that organisation's system.

The remaining 7 sensitive complaints were related to confirmed or alleged breaches of DCA's anti-corruption principles. The below overview indicates from which countries the complaints were received.



Country	Number of corruption complaints received at CO
Cambodia	1
Ethiopia	1
Mali	1
Nepal	1
South Sudan	1
Zimbabwe	2

6.2 Increase of non-sensitive complaints and decrease of sensitive complaints

Comparing these numbers with 2019, where a total of 1681 complaints were received globally, of which 1595 were categorized as non-sensitive complaints and 85 categorized as sensitive complaints, we see a significant increase in the number of non-sensitive complaints received, and a decrease in the number of sensitive complaints.

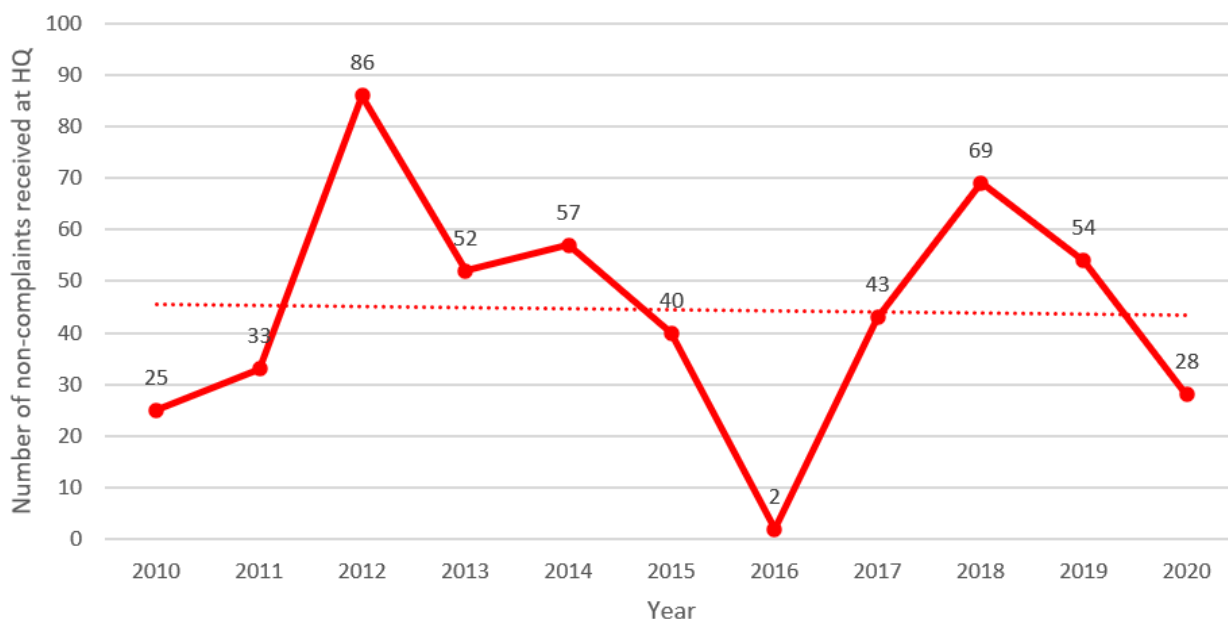
The reason for the increase of non-sensitive complaints can possibly be related to the COVID-19 pandemic which has increased people's desperation, meaning more people need support. An example is in Northeast Syria (NES), where this has resulted in increased numbers of households requesting inclusion in assessments and contesting existing selection criteria for receiving support from DCA.

The explanation to the substantial decrease of sensitive complaints received in 2020 (85 in 2019 and 13 in 2020), could equally be seen in the light of the pandemic. Based on consultations with selected COs it was highlighted that most employees have worked from home or even been evacuated for most of the year, and thus not been able to be physically at work, to identify breaches of the code of conduct and its related policies, nor to create awareness, to remind and to encourage filing sensitive complaints, whether related to corruption or to PSEA. It is possible that because of social distancing regulations and the lack of contact with each other, this has led to fewer code of conduct violations.

With regards to discovering corruption, DCA is reflecting on whether all corruption cases are being discovered. DCA knows some complainants fear of retaliation. DCA communicates the importance of reporting corruption to the complaints system and without fear of retaliation. Monitoring the work of partners without it being perceived by the partner as a lack of trust is challenging.

6.3 Non-sensitive complaints in Denmark

In Denmark, DCA dealt with 28 non-sensitive complaints in 2020, which is a decrease from the previous year where DCA received 54 non-sensitive complaints at HQ. See figure below.

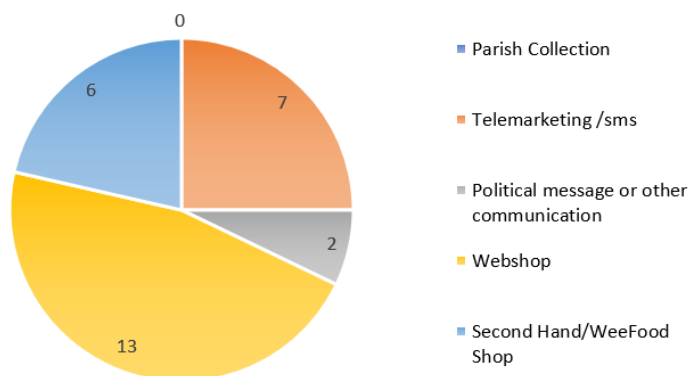


A plausible explanation for the decrease in 2020 is the COVID-19 pandemic which, among other things, caused a lock-down of DCA's Second-hand shops in March. The shops gradually opened again in the beginning of May, and meanwhile online shopping was not an option.

The Parish Collection was carried out digitally, which might also explain that people who contributed to the collection have done it without being met by volunteers in person. This could possibly have affected the level of conflict and dissatisfaction, and therefore no complaints were received regarding this activity.

As mentioned in last year's Complaints Report, DCA closed its face-to-face activities in Denmark in the last quarter of 2019 and it is therefore likely that the reduction in number of complaints can be explained by this.

Below please find an overview of operational complaints received at HQ level in 2020, and their categories.



In comparison, in 2019 DCA received 54 the non-sensitive complaints in Denmark and they were distributed as follows: Parish Collection 7, Face2Face 1, Telemarketing 25, Political message or other communication 9, Webshop 7, Second Hand/WeFood Shop 5.

In 2020, the majority (13) of the complaints are related to DCA's Webshop, and mostly of a technical nature and hence quickly resolved. 7 complaints are related to telemarketing and come from people who wish to



be taken off the call-lists. Complaints related to DCA's political messages or other communication were reactions to articles or statements which some people disagreed with.

DCA addresses all complaints and strives for a constructive dialogue with all complainants. All complaints were addressed, and the complainants received a response from relevant members of staff in DCA.

7. Corruption complaints

The following is a description of each corruption case, how it was handled and what DCA learned. The first three cases have been brought forward from previous years.

(2019.C06) Partner organisation suspected of corruption and embezzlement.

What happened: DCA's programme auditor reported suspected corruption and embezzlement by a partner organisation since 2018.

What DCA did: An audit was conducted and found reason to uphold the allegation of misappropriation of funds and fraud. This resulted in an immediate termination of the contract with the organisation and its exclusion of future projects. DCA informed the Danish Embassy, MFA as well as the partner's Board. DCA initiated intensive activities to retrieve the funds and assets, including sending several letters to the partner to claim back the funds. Furthermore, DCA met with the staff and Board of the organisation. All the funds from 2019 were recovered but not the funds from 2018. Most of the assets were returned to DCA. Even though the organisation stopped operating, the case continued throughout 2020, because DCA reached out to a local lawyer, who in the legal statement recommended DCA not to institute a civic suit against the organisation for recovery of the misappropriated funds. Several observations by the lawyer, such as minimum chance of winning the case if going to court and the financial and human resources that would be spent in the process, indicated that it was advisable to close the case. DCA recommended MFA to close the case, however MFA required that DCA reported the case to the local police for criminal investigation and stressed that it is not sufficient for DCA to pay the misappropriated amount, even if relatively small.

DCA's risk assessment of the situation for civic space actors in the country - especially those fighting for civil and political rights - was that the situation was very volatile and that there was a real and high risk of intimidations, persecution and forced closures of CSOs. Therefore, DCA was afraid that potential publicity related to pursuing a case like this in the current unpredictable political climate could put DCA's human rights partners more at risk than they already were, and it could also damage DCA's reputation in the country. The case is still not closed, and DCA is still in dialogue with the Danish Embassy and MFA about the next step. The outstanding amount is 93,945.69 DKK.

What DCA learned: This case underlines the importance of performing audits of DCA's partner organisations on a regular basis. Even though DCA carries out regular monitoring visits and receives financial and narrative reports from partners, it can be difficult to detect embezzlement of money by partners. Despite DCA's zero tolerance to corruption, it is DCA's due responsibility to consider the risk of following legal proceedings in countries where the volatile situation can put DCA and partners at risk, by reporting the case to the police and following legal proceedings. Such consideration and possible derogation can be counter to the respective donors' policies and compliance requirements, which is the reason why this case is not yet closed.

(2019.C07) Confirmation of financial misconduct, fraud, and nepotism among senior staff of a partner.

What happened: In March 2019 DCA received indications that senior staff of one of DCA's partner organisations were involved in suspected fraud. DCA has worked with the partner since 2012. DCA initiated an internal investigation to obtain more information and specific examples. The investigation showed



strong indications of fraud taking place in the organisation. A forensic audit was carried out and the findings were significant with substantiated evidence that senior staff of the organisation were involved. DCA terminated the cooperation agreement, made a great effort to retrieve the assets, and managed successfully to get back some of the most valuable assets.

What DCA did: Attempts to have the mismanaged funds (190,000 DKK) returned have not been successful due to the lack of response by the former partner organisation to the various correspondences sent during the following year. Some assets - 5 laptops, 3 motorbikes and a container have been returned to DCA. On 3rd October 2020, DCA's lawyer sent a letter of demand to the organisation requesting repayment of mismanaged funds within 14 days, with failure to do so would result in legal proceedings to pursue the case. Receiving no response, DCA instructed its lawyer to initiate legal proceedings. The case is likely to take some time (potentially between 3 – 5 years) in the court, however DCA's lawyer believes that there is sufficient evidence to prove that the organisation is responsible for the misappropriation of the funds.

What DCA learned: Although a lengthy process, pursuing the option to take the former partner to court and hold them accountable for the misuse of funds which were meant for supporting vulnerable populations is worthwhile, and demonstrates DCA's commitment to the Core Humanitarian Standards of accountability.

(2019.C09) Fraud discovered with a long-term implementing partner.

What happened: In late 2018, suspicion was raised by slow implementation of a project by a partner organisation, and the quality of the project deliverables was not fulfilling DCA standards. In 2019, all donors supporting the partner carried out an institutional audit for the period 1st July 2017 to 31st December 2018 indicated that expenses of 600,000 DKK were suspected of not being in compliance with relevant rules, regulations, policies and procedures. One of the donors claimed back their part of the money and initiated capacity development of the organisation to strengthen their systems and procedures.

What DCA did: Based on suspicion of fraud, DCA suspended the cooperation agreement and initiated a forensic audit in June 2019 for the period 1st January 2018 to 30th June 2019. The final forensic report was delivered after deadline in late February 2020, and the quality of the report was poor. In several engagements with the partner from April to July 2020, the partner maintained that the decision of DCA to terminate the agreement was not sufficiently substantiated by the audit findings and they therefore could not accept termination of the cooperation agreement. They finally suggested arbitration. DCA engaged with an independent lawyer for a legal analysis of DCA's options, and did an internal as well as external risk assessment with donors. DCA and the partner agreed on an 'out-of-court settlement' from the partner signed by all their Board members, which was confirmed 26th August 2020. The partner accepted the termination of the cooperation agreement; all Board members accepted DCA's analysis on the severe organisational concerns; all Board members have accepted the audit noted key challenges in financial accountability and transparency, even though the Forensic Audit couldn't sufficiently document the extent of the problems.

What DCA learned: DCA should not share the TOR with the partner for a forensic report, which was done in this case, because it will disrupt the investigation. A forensic audit based on spot checks is often not enough for a legal court case as the details of the mismanagement of funds is not sufficient. DCA has learned that it can be challenging to find skilled auditors in some of the countries where DCA works, and therefore DCA will keep a register of those auditors that perform well and always ensure to invite them to bid when DCA tenders such tasks.



(2020.C01) Partner suspects former DCA employee of misconduct.

What happened: A complaint was filed by a complainant from another organisation, who was not a DCA partner. The complaint was related to a current employee of that organisation, whom had previously been a DCA employee. The allegation was that the SoC had built up a network of DCA employees in a remote field office, several hours from the DCA CO, when he worked with DCA, and put pressure on them, to pay him funds or goods on demand.

What DCA did: The case was investigated internally in DCA, and during the investigation it came up that the organisation had also investigated the case, but without success as their staff did not know or wish to speak about the case. There were no witnesses to interview from the organisation, other than the complainant. DCA's investigation was not able to bring forward any substantiated examples of the allegation on pressure from the SoC as there were no witnesses from neither DCA nor the organisation that could be interviewed. DCA closed the case with a note to the file that the Country Director (CD), during his next visit to the field office, should observe potential malicious in this regard. The CD however was not able to travel to this field office for a long time and no further reporting was made.

What DCA learned: It is very difficult to identify and conduct interviews with staff regarding sensitive issues such as fraud, when there are not any concrete examples of the allegations. In these situations, the best DCA can do is to be alert and inform management to be observant during a next visit to the place of occurrence.

(2020.C02) Fraud in partner organisation leads to the suspension of future funding.

What happened: During the process of conducting a desk review for a partner in preparation of a donor audit, a suspicion of fraud involving the Director of the partner organisation, was discovered.

What DCA did: The case was investigated, internally, by DCA's Finance Officer, and the results showed misappropriation of funds amounting to 95,000 DKK. The donor was informed, and the partner was suspended from any future funding opportunities with DCA. The Director/SoC was requested to pay back the amount. The Director/SoC paid back most of the amount, and the outstanding balance to be paid is now 21,000 DKK. The case is still not closed as DCA is attempting to retrieve the final balance.

What DCA learned: Regular monitoring visits and reviews are necessary to ensure that partners are adhering to policies set to safeguard the funds of the organisation.

(2020.C03) Weak financial procedures leading to irregularities with a partner.

What happened: During a regular monitoring visit, DCA Finance Officer detected several financial irregularities. These irregularities were noted in a detailed monitoring report and the partner requested to clarify and explain the observations. Responses provided by the partner were insufficient and led the DCA management team to probe further.

What DCA did: DCA sent a team consisting of its Head of Finance and Head of Programme to investigate the case further. The mission was successful in clarifying that no irregularities were found, and that the main conclusions were related to a general lack of discipline and knowledge of basic financial and procurement principles as well as a lack of procedures, across the organisation. During the visit to the partner, DCA staff met with the Board of the organisation and received assurances that the shortcomings would be addressed with celerity and seriousness. DCA issued a warning letter to the partner copied to its Board and requested an action plan to address the weaknesses identified in finance and procurement. DCA would ensure both support and follow-up of the implementation of the plan. The amount that had been spent outside procedures and that could not be justified, was refunded to DCA. The Executive Director of



the partner organisation was given a warning by its Board. DCA management team concluded that the partner would be given a chance to improve.

What DCA learned: This incident confirms the importance of monitoring partners financial and administrative procedures. It emphasizes the importance of the partnership assessment and DCA's responsibility in regular follow up assessments and offering partners organisational development or capacity strengthening support.

(2020.C05) Mismanagement discovered with a partner during monitoring visit.

What happened: During a Country Director's (CD) monitoring visit to a partner, a distribution of equipment was discovered with a different logo on the labels than the partners and donors.

What DCA did: An internal investigation was carried out which included a field visit and interviews with the Director of the organisation. Despite weak and insufficient findings of internal financial and procurement procedures, the investigation could not confirm any intentional misdoings. However, as it was still illegible, the partner should have rejected the goods and sent it back to the supplier. DCA requested the partner to return the 46,000 DKK and the funds were deducted from the final project transfer as per the partnership agreement. DCA informed the partner, who reported the illegible cost to their donor.

What DCA learned: Regular monitoring visits to partners, are essential to discover weak financial procedures. Systematic support to this partner in the area of procurement and finance needs to be taken into account when budgeting for capacity strengthening support, if DCA decides to continue the partnership when the present corporation agreement expires in mid-2021.

(2020. C06) Possible fraud in E-voucher programme.

What happened: A Senior Programme Officer in one of DCA's field offices, submitted a complaint on suspicious transactions with the possible involvement of DCA field staff. The complaint was based on Excel sheets showing that cash had been distributed through e-voucher transactions to beneficiaries, who however had not by signature acknowledged receiving the cash, raising suspicion that the beneficiary perhaps did not exist.

What DCA did: Further distributions to these beneficiaries were immediately blocked and an internal investigation was initiated. E-voucher transactions were reviewed including tracking some of the beneficiaries to verify if they had received the pin code for the e-voucher transactions or not. The investigation concluded that there was no fraud and no attempt of fraud. However, due to identified gaps in the distribution process, it was found out that 45 beneficiaries had reported during the verification process and registered as a new beneficiary leading to a duplicate entry. The investigation did show some weaknesses in DCA's internal systems and a follow-up revision of SOPs and further disaggregation of duties in terms of distribution of smart cards and pin codes, were carried out.

What DCA learned: The issue was discovered the day after it happened, and the result of the investigation was concluded 3 weeks later. The case in turn therefore became a good opportunity for DCA to evaluate its e-voucher distribution systems- and procedures and demonstrate DCA commitment to act swiftly on any complaint. It was also a good learning for the field team on how to approach such issues.

(2020. C07) Partner reporting complaint and requesting for investigation.



What happened: A complaint, related to corruption, abuse of power and sexual harassment was raised by a partner who then reached out to all members and donors in the established network and requested assistance for the investigation.

What DCA did: Network members, including DCA and donors collaborated on the investigation. However, due to the COVID-19 pandemic, the investigation was challenging and postponed several times. The investigation did not find any evidence to substantiate the allegations. Disciplinary actions were taken towards the SoC for not having been aware of his own limitations related to the financial overview.

What DCA learned: This case shows the importance of DCA partners to have in place a mandatory complaints system, as this is essential for cases like this to be brought forward. It is crucial that partners work together on investigating sensitive complaints, for everyone to be involved in the process and to be able to report back to each of their donors.

(2020. C08) Social worker taking money from beneficiaries.

What happened: A complaint was submitted to DCA via the complaints toll-free line by a beneficiary. It was alleged that a social worker was asking DCA beneficiaries to be weighed and pay a weighing fee of 0,25 DKK per person, to receive their funds from the DCA distributions. The complainant alleged that the social worker had been mobilizing beneficiaries to a different geographical area for the weighing exercise. According to the complaint, a total of 265 households out of 1188 households could have been affected, and possible that the amount collected from the beneficiaries was approximately 291 DKK.

What DCA did: Upon receipt of the complaint, DCA's complaints focal person contacted HQ for further guidance on the matter. In addition to this, DCA engaged the District Social Welfare (DSW) Officer responsible for the district where the alleged activities had happened. Together a preliminary investigation in the area, was carried out, followed by a report to the police. Parallel to this, the police carried out their investigation, and the alleged social worker was summoned to the DSW office, where it was established that:

- 1) The social worker was not targeting DCA beneficiaries but was instead weighing children under a different Non-Governmental Organisation (NGO).
- 2) The social worker was not aware of the DCA programme and the beneficiary list that was used belonged to a different NGO; she did not have access to the DCA beneficiary list.
- 3) The social worker admitted that she had wrongfully used the other NGO's name to defraud the community and 444 clients fell victim to this scam losing approximately USD\$18.

DCA sent bulk SMS to all beneficiaries warning them about the scam, but no further complaints were submitted by the beneficiaries. Investigations by the police revealed no involvement of DCA's beneficiaries. The police and DCA therefore closed the case. Following the guidance of the DSW policies, the social worker of the other NGO was disengaged from duty.

What DCA learned: It is crucial to make complaints systems available and communicate the complaints handling platforms to communities and sensitize communities on potential scams that may arise following development projects and the need to be vigilant against such.



8. Planned focus-areas for 2021

Below activities are planned to be implemented in 2021. Follow-up on each of the focus areas, will be reported on in next year's report.

1. Training COs in the complaints and accountability framework
2. Sessions on safeguarding, protection, including PSEA and strategy for reaching communities with information about expected staff behaviour
3. Establish opportunities for partners to undertake the CHS self-assessment
4. Develop and implement appeal procedure
5. Develop and communicate complaints- and /or whistle-blower policy
6. Develop ToR for the roles and responsibilities of the complaints investigator(s) and the CC
7. Action Plan to be developed and implemented raising the Corrective Action Requests and observations including recommendations from the Re-certification Audit
8. Integrate UNICEF PSEA Toolkit in DCA Safeguarding Framework
9. Implementation of the ECHO ex-ante Audit recommendations
10. Update of e-learning training on FABO including establishing a system that can keep track of employees who have undergone the training
11. Launch of FAFPI webinar