



DanChurchAid

Complaints Report 2022



DCA Strategy and Quality Management Unit

March 2023

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Abbreviations

AIP - Accountability Improvement Plan
CC - Complaints Committee
CAR - Corrective Action Request
CHS - Core Humanitarian Standard
CO - Country Office
CoC - Code of Conduct
CSOs- Civil Society Organizations
DCA - DanChurchAid
DKK- Danish Krone
DR Congo - Democratic Republic of Congo
ECHO - European Civil Protection and Humanitarian Aid Organisation
FAFPI - Fight Against Facilitation Payment
GDPR- General Data Protection Regulation
HQ - Headquarters
HR- Human Resources
MFA - Ministry of Foreign Affairs
OBS - Observation
PSEAH - Prevention of Sexual, Exploitation, Abuse and Harassment
PwC- PricewaterhouseCoopers
SEA- Sexual Abuse and Harassment
SoC - Subject of Concern
SOP - Standard Operating Procedure
SQM - Strategy and Quality Management Unit

1. About the Report

The *DanChurchAid Complaints Report 2022* is DanChurchAid's (DCA's) 18th Annual Complaints Report. The Complaints Committee (CC) produced the report at DCA's Headquarters (HQ) and is endorsed by DCA's Board.

DCA commits itself to writing the yearly complaints report as it considers the report an important initiative to continue a high degree of transparency and learning as learning is one of several important ways to fight misconduct and corruption.

This report presents some of the key areas DCA worked with in relation to the Accountability and Complaints system during 2022, highlights the initiatives launched, and presents what is planned to commence in 2023.

The report gives an insight into the operational complaints received in Denmark, as well as the sensitive complaints the DCA's Complaints System and/or WhistleBlower Scheme receive.

In this report, all complaints related to DCA's Code of Conduct (CoC) and its related policies Prevention of Sexual Harassment, Exploitation and Abuse (PSEA), Child Safeguarding and Anti-Corruption are only described in a general manner, with a focus on analysis of the data available in DCA's database.

2. Introduction to DCA's complaints handling mechanism

DCA has two separate systems in place:

Whistleblower Scheme – is for reporting of sensitive complaints of all current DCA employees and former employees up till one year after termination of contract. A whistleblower report typically concerns matters of a serious nature, such as criminal offences, corruption, sexual exploitation, breaches of law, or serious violations of DCA personnel policies.

Complaints System – is the system that external parties as people supported by DCA, partners, vendors, etc use when reporting sensitive and operational complaints. It is also used for reporting operational complaints for current and former DCA employees. An operational complaint is typically a complaint about the quality of DCA's work.

The ACT Alliance defines a complaint as a specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment. Grievances are typically between the employee and employer.

DCA categorises complaints into two different categories: sensitive and operational. Operational complaints are personal grievances or complaints related to programmatic or HR issues.

Sensitive complaints from DCA staff, partners, consultants, service providers, suppliers and people supported by DCA directly or indirectly must be reported through DCA's Complaints System or the Whistleblower Scheme and these include serious or repeated breaches of important internal guidelines and policies in DCA, including the DCA Staff Code of Conduct and the policies it refers to: DCA's Staff Policy to Prevent Sexual Exploitation, Abuse and Harassment (PSEAH), DCA Policy on Anti-Corruption, and DCA Child Safeguarding Policy.

In HQ, the Accountability and Complaints Advisor is responsible for handling sensitive complaints after consulting with the complaints committee (CC), consisting of the following members: International Director, Head of Strategy and Quality Management (SQM), and

relevant finance or human resources (HR) colleagues when needed and depending on the nature of each complaint. Each country office has appointed an Accountability and a Complaint Focal Point, whose responsibilities are, among others, awareness, and implementation of the Core Humanitarian Standards (CHS), as well as complaints handling when relevant with proper guidance from the HQ Accountability and Complaints Advisor.

3. Scope and Limitations

DCA's Complaints Report 2022 does not provide descriptions or analyses at the level of individual complaints, cases, or regions, nor detailed analysis for country-specific data. Rather, the focus is at the global HQ level for sensitive complaints received throughout the year, with additional analysis as compared to the report of 2021.

4. Complaints Received in 2022

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, complaint descriptions related to the DCA Code of Conduct (CoC) and safeguarding policies (PSEA, Child Safeguarding) are anonymised and summarised. DCA's intentions are that the readers of this report will gain an understanding of how DCA handled each case with diligence. Moreover, the report ensures that DCA utilises every donation it receives for its intended purpose and that everyone entrusted with a position of power in DCA is aware of the organisation's values regarding expected staff behaviour and the CoC.

Each year, a member of the DCA board, in their 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.

Partner's Complaint Systems and Complaints Received

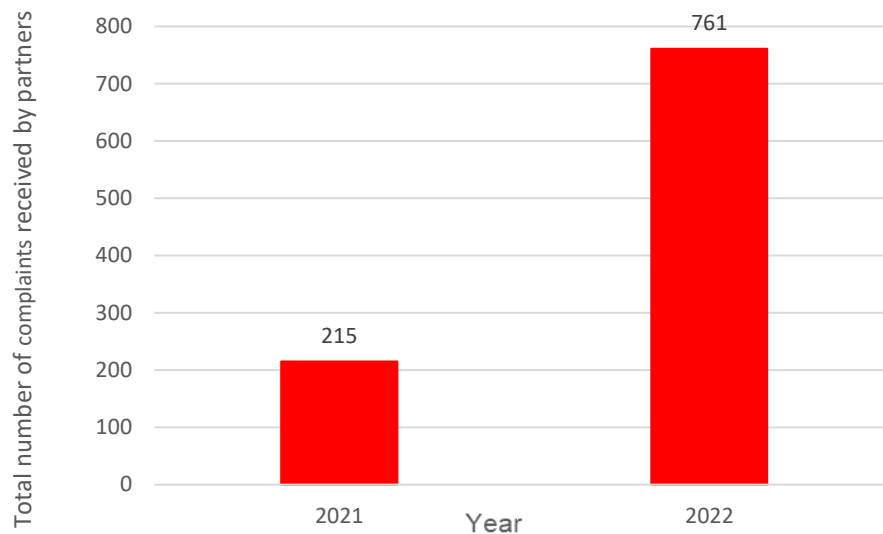
126 of 204 partners had complaints systems in place in 2022, equivalent to 62% of all DCA's partners.

113 out of 187 partners had complaints systems in place in 2021, or 60% of all DCA's partners, and 142 out of 205 partners in 2020, or 69%. Despite the fact that the percentage of partners with complaints systems in place is similar in 2021 and 2022, yet DCA had more partners in 2022 than the year before, and a higher number of partners had a complaints system in place (126 in 2022 compared to 113 in 2021). DCA is continuously supporting partners without complaint systems in setting them up.

Data from the Annual Global Report 2022 reflect that the 126 partners received 761 complaints in total in 2022. The 2021 report indicated that 113 partners received 215 complaints. It was the first year DCA measured the number of complaints partner organisations received and therefore the number cannot be compared to earlier years' numbers. However, this information can give COs an indication of whether partners keep track of the complaints that they receive and provide ground for a strategic capacity building plan in this regard, where needed. The increase in the number of complaints received by partners in 2022 (as shown in Figure 1) reflect the results of the trainings and capacity building delivered by DCA to the partners on complaints handling, where DCA COs supported their partners to put in place their own complaints handling systems and emphasized on the need for proper documentation and

tracking of complaints received.

Figure 1



Some COs reported that a high number of their partners have a complaints system in place, yet a very low number of complaints were received. Hence, additional efforts will be made by DCA COs in 2023 to ensure that all partners have complaints systems in place and are actively receiving complaints, recording them, and responding to them. DCA has also developed a complaints quarterly reporting template to keep a closer and more consistent track of a Corrective Action Required (CAR) from the CHS audit. The template will be launched to COs during the first Accountability and Complaints Focal Points Webinar in 2023 and will be implemented as of Quarter 1 2023. The quarterly reporting template will include categories of feedback and complaints received by COs and their partners. Consequently, more analysis can be included in the next complaints report 2023 around the types of complaints received by partners compared by quarter, the channels through which complaints were received, etc.

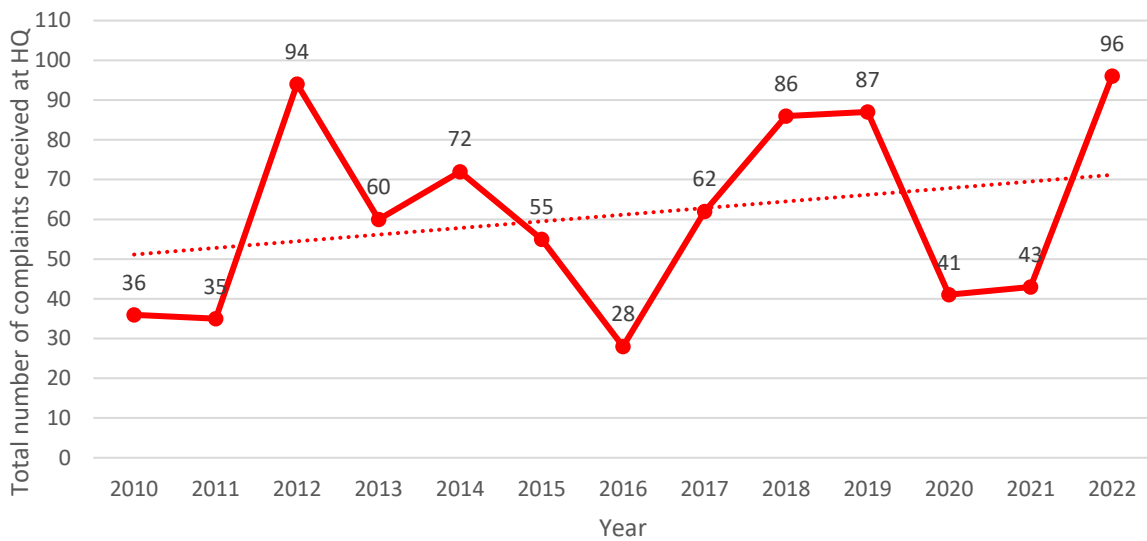
Complaint's Systems and Complaints Received Globally

a. Complaints received by HQ in 2022

A total of 101 complaints were received by HQ in 2022, of these 50 were categorised as operational, 46 categorised as sensitive complaints, handled in collaboration with DCA's HQ Complaint Committee (CC), and 5 complaints were not handled due to lack of information where the complainant never replied back and were hence removed from the analysis, giving a total of 96 valid complaints in 2022. Of these, 92 were received through DCA's complaints system (the online complaint form on the website or by email) and 4 were received through the Whistleblower Scheme. Additional analysis is included in this report compared to the report of 2021 and hence some figures cannot be compared with the figures from previous years.

As shown in Figure 2, this is the highest number of submitted complaints received by HQ since 2010. Regarding the double increase in the number of complaints received by HQ (43 in 2021 and 96 in 2022), an explanation could be the awareness raising around DCA's complaints systems delivered to staff in COs and the reminders shared by HQ to Country Directors and Complaints Focal points. Another explanation could be that the reduction of or elimination of COVID-19 restrictions in some countries in 2022 compared to 2021 and 2020 resulted in an increase of received complaints globally in 2022, whereby field activities were resumed, DCA staff returned to working from the offices and physical monitoring of checks and balances and internal controls were reinitiated.

Figure 2



A sensitive complaint is defined as an alleged breach of DCA’s CoC or its related policies. An operational complaint is defined as related to as a programmatic (i.e., dissatisfaction with DCA’s services) or an HR issue.

Table 1 illustrates the number of complaints received by HQ per category of complaint (sensitive versus operational) per month. Findings reflect that the months of November and July recorded the highest numbers of complaints (15 and 12, respectively), with 8 sensitive complaints recorded in November, compared to 7 in July).

Table 1

Month	Operational	Sensitive	Grand Total
January	4	5	9
February	5	3	8
March	5	3	8
April	3	2	5
May	2	4	6
June	6	3	9
July	5	7	12
August	6	3	9
September	3	1	4
October	2	5	7
November	7	8	15
December	2	2	4
Grand Total	50	46	96

Operational complaints received by HQ were either referred to relevant colleagues in HQ to address them (if the complainant is from Denmark) or referred to the CO for handling. Examples of operational complaints referred to COs include HR related issues, community members requesting support as assistance was rejected, community members requesting support in recruitment, delays in cash payments and others.

Table 2 below presents the number of complaints received by HQ disaggregated by the type of complainant and type of complaint (sensitive versus operational). It is encouraging to see that the majority of sensitive complaints come from DCA's management and programme staff as well as complaints focal points in COs because DCA is relying upon them to report suspicions of misconducts in the field and remote areas. This also reflects that DCA's management and programme staff trust DCA's complaints system, which is essential to ensure that it is adequately promoted within the organisation. Yet, there will be more focus on awareness raising among DCA staff in 2023 after the roll-out of some communication material to increase the visibility around DCA's complaints system, DCA's CoC and expected staff behavior, with the aim of encouraging staff to report any suspected misconduct.

Table 2

Types of complainants	Operational	Sensitive	Grand Total
Anonymous	6	6	12
Community member (not supported by DCA)	32	2	34
Current DCA staff (management)		16	16
Current DCA staff (programme)	2	5	7
People supported by DCA	4		4
DCA implementing partner		1	1
Focal points in country offices on behalf of complainant	2	10	12
Former DCA staff	1	4	5
Other external stakeholder	1	2	3
Others	2		2
Grand Total	50	46	96

On the other hand, the majority of operational complaints submitted came from community members not supported by DCA. Four of the operational complaints and none of the sensitive complaints came from people supported by DCA. Hence, there needs to be a continuous organisational effort towards building the awareness of the communities where DCA work or of the people supported by DCA on the DCA's complaints system and the CoC as well as ensuring their safe and trusted access to it to have had an effect. The number of complaints raised by community members or people supported by DCA is very small in comparison with the number of persons DCA is reaching, assisting, and interacting with.

DCA acknowledges that it takes courage to file a complaint. DCA also acknowledges that fear of complainant's safety and security as well as culture in the countries where DCA works are among the reasons for not bringing forward all complaints, where bringing forward grievances, mistrust, and complaining is not common.

Anonymous complaints constituted 6% of all complaints submitted to HQ. These complaints are often difficult to process because the reporting person(s)' lack of willingness to cooperate prevents the complaints committee and the investigative team from collecting all necessary information and potential evidence.

Table 3 below presents the number of complaints registered in HQ by country and type of complaint (sensitive versus operational).

Table 3

DCA CO	Operational	Sensitive	Grand Total
Bangladesh		4	4
Cambodia		1	1
Central African Republic	1	8	9
Denmark	28		28
DR Congo		4	4
Ethiopia	1	2	3
Iraq	1	1	2
Kenya		5	5
Lebanon		2	2
Libya	1	2	3
Malawi		1	1
Mali		1	1
Myanmar		1	1
Nepal		1	1
Not specified	3		3
Palestine		1	1
South Sudan	3	8	11
Syria	10	3	13
Uganda	2		2
Zambia			0
Zimbabwe		1	1
Grand Total	50	46	96

More than half of operational complaints received in 2022 were coming from Denmark (28 complaints) followed by Syria (10 complaints). The two DCA COs that had the highest number of sensitive complaints recorded were Central African Republic and South Sudan (8 complaints each). The only country where DCA is operating but no complaints were registered or received by HQ is Zambia.

Operational complaints in Denmark

In Denmark, DCA dealt with 28 operational complaints in 2022, compared to 18 complaints in 2021 and 28 in 2020. See figure 3. The operational cases received through the HQ complaints system had the following categories: Second hand: 5; Telemarketing: 13; Political messages: 2; Parish Collection: 2, HR related issue: 1 and Others: 5. Despite the general increase in number of operational cases in Denmark compared to 2021, DCA did see that the number of operational cases related to DCA second-hand shops decreased in 2022: 12 operational complaints received in this category in 2021 and 13 in 2020. This could be a potential improvement where DCA HQ and the head of the shops handled and resolved the complaints received in 2021 and gave remarks/observations to DCA’s volunteer staff working in the shops to avoid further complaints or dissatisfaction with services.

Figure 3

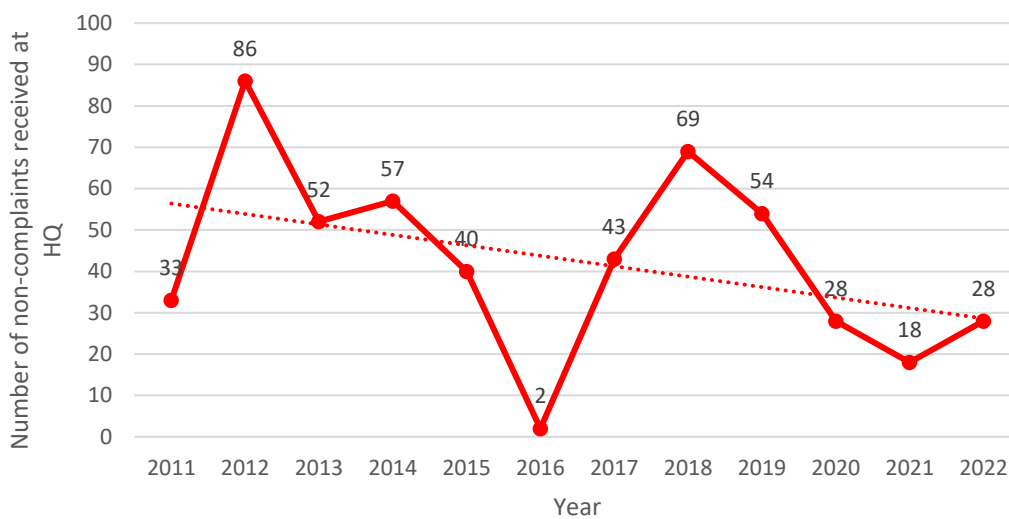
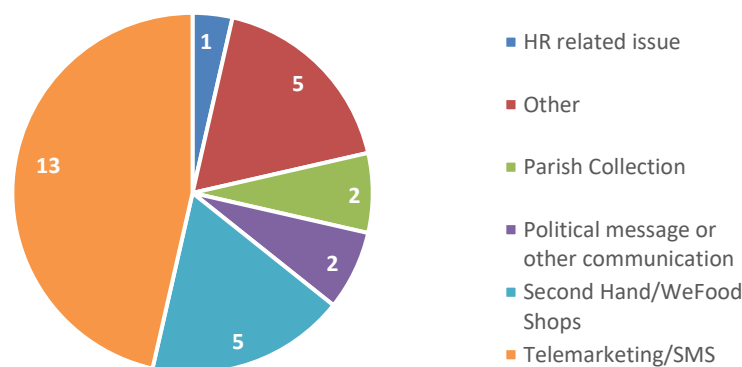


Figure 4 presents an overview of operational complaints from Denmark received in HQ in 2022 and their categories. The complaints falling under Telemarketing/SMS increased from 2 in 2021 to 13 in 2022, where additional complaints came from people who wished to be taken off the call-lists and these were addressed. Most of the inquiries about data protection are not actual complaints and are rather sent via DCA’s data protection email address handled by the DCA Compliance Coordinator. These are related to data subjects (persons that DCA registers) making use of their “right to be forgotten”. DCA ensures its commitment to transparency when it comes to data protection breaches. No breaches were registered yet, but three data protection complaints were received in 2022 and these were followed up by DCA’s Data Protection Consultant. One of them is still being processed by the Danish Datatilsynet.

It should be noted that many of the operational complaints do not come through the complaint system and are not registered. Many operational complaints are received and handled elsewhere such as in the shops or at the telemarketing department in Aarhus.

Figure 4



DCA addressed all operational complaints and strived for a constructive dialogue with all complainants. All complaints were addressed, and the complainants received a response from relevant employees in DCA.

Sensitive complaints received by HQ

Out of the 46 sensitive complaints received, 19 were related to a breach of DCA's Anti-Corruption Policy, 13 related to a breach of DCA's Code of Conduct, 10 related to a breach of DCA's PSEA Policy, and 4 were considered as breaching both DCA's CoC and Anti-Corruption Policy as the complaints had allegations pertaining to both. Table 4 shows data on the types of suspected misconduct registered in HQ in 2022, presented in descending order according to the number of times they were reported and their percentage out of all sensitive cases reported. Findings reflect that 50% of complaints submitted entailed suspicions and allegations around corruption (23 in total), and hence this was the most frequent type of misconduct reported for sensitive complaints.

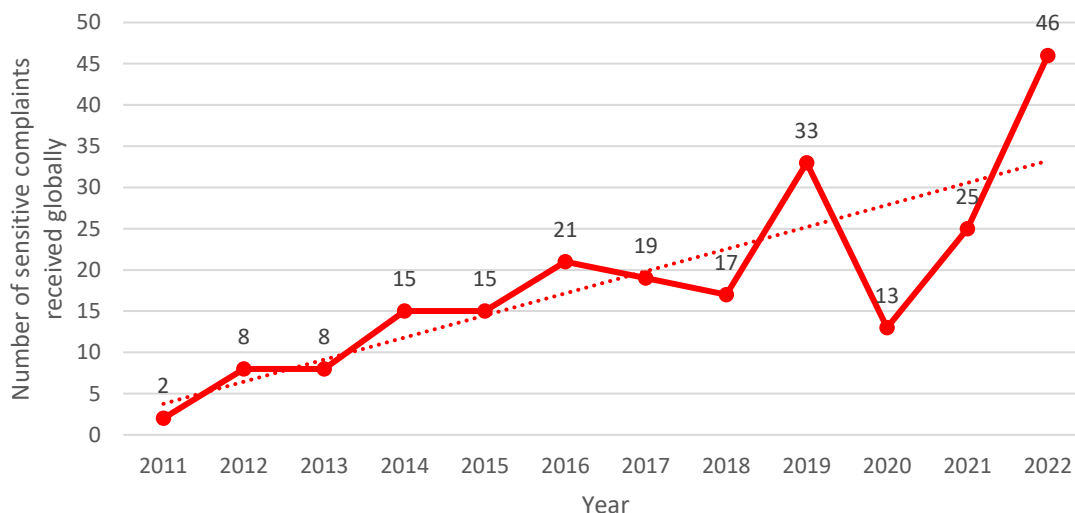
The sensitive complaints related to alleged or suspected breaches to the CoC, and underlying policies are highly sensitive for the persons involved. DCA does not report publicly on these cases out of respect for the safety and legal rights of those involved.

Table 4

Type of misconduct	Number of complaints	Percentage out of all complaints
Breach of anti-corruption policy	19	41%
Breach of CoC	13	28%
Breach of PSEA policy	10	22%
Breach of CoC and anti-corruption policy	4	9%
Grand Total	46	100%

DCA experienced an increase in the number of sensitive cases received in 2022 compared to 2021 and 2020 (see Figure 5).

Figure 5



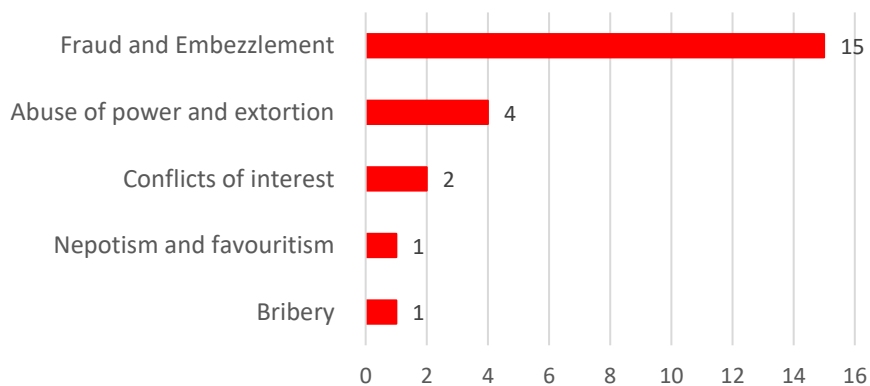
Regarding the almost double increase in sensitive complaints (13 in 2020, 25 in 2021 and 46 in 2022), an explanation could be the awareness sessions on the complaints system, held throughout the year with most COs, which made the process for making complaints clear to all employees, including information on how to report, especially after the launch and roll-out of DCA Whistleblower and Complaints Handling Policy, which was developed in 2022 and communicated to COs. Employees are contractually bound and trained to report any suspicion of misconduct by DCA employees, implementing partners, and other stakeholders related to

DCA’s mandate. Another explanation could be that the reduction of or elimination of COVID-19 restrictions in some countries in 2022 compared to 2021 and 2020 resulted in an increase of received complaints globally in 2022. For instance, the internal controls were operational again in 2022 and thus an increase of reporting breaches of the CoC into the complaints system was experienced. Moreover, COVID-19 prevalence in 2020 and 2021 drastically limited community interactions in some countries, as activities and field engagements were limited, but these were almost back to normal in 2022 and hence this increased the possibility of having breaches to the CoC at field level.

Receiving complaints is viewed as a positive indication that stakeholders trust DCA with their grievances on sensitive issues. Furthermore, it indicates that COs are becoming more effective at communicating the right, and opportunity, to report complaints to employees, partners, and people supported by DCA.

Figure 6 illustrates the types of misconduct breaching DCA’s Anti-Corruption Policy as reported in the 23 complaints received by HQ in 2022. Fraud and embezzlement were the highest category reported, constituting 65% of all corruption related complaints reported.

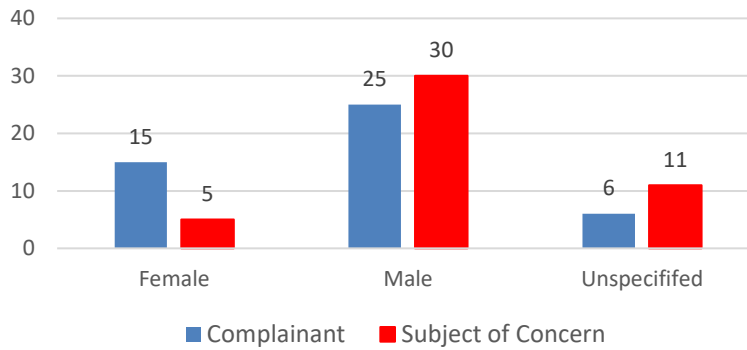
Figure 6



In order to ensure transparency and compliance with donor requirements, reporting of allegations to donors was streamlined in 2022. DCA Accountability and Complaints Advisor is responsible to ensure that suspected misconduct is reported to the donors as per their reporting requirements. For instance, all suspicions of irregularities, misuse, fraud or corruption within the administration of Danida funds need to be directly reported to the Ministry of Foreign Affairs (MFA) in Denmark. Other donors also take this issue incredibly seriously, particularly reports of SEA. Hence, DCA Accountability and Complaints Advisor has been deeply involved in the preparation of donor reports and dealing with detailed donor follow up in 2022.

DCA aims to more meaningfully collect, and extract data related to complainants’ and subjects of concern’s gender, provided the information is known (else it is recorded as Unspecified). Figure 7 shows that the majority of complainants and subjects of concern for the 46 sensitive cases are males.

Figure 7



The following table 5 presents data on the types of SoCs suspected of misconduct for sensitive cases reported in HQ in 2022. Findings reflect that DCA programme staff were the most complained about (16 in total), followed by DCA’s management staff and DCA implementing partners’ staff equally (10 each).

Table 5

Types of SoCs	Total
Current DCA staff (management)	10
Current DCA staff (operations)	9
Current DCA staff (programme)	16
DCA implementing partner	10
Former DCA staff	1
Grand Total	46

Table 6 provides an overview of the status of the 46 sensitive complaints in DCA’s database as of 30 March 2023. The majority of sensitive cases from 2022 were closed at the time of the annual report, contrasted to a small number of cases that remained open.

Table 6

Status	Number of complaints
Closed	41
Open	5
Grand Total	46

All sensitive cases received in HQ are processed by DCA’s CC who meet to analyse the case and agree on the best way forward to handle or respond to the case. Table 7 below shows the CC response to the 46 recorded sensitive complaints in 2022. Out of the total of 46 cases submitted in 2022, CC decided on investigation as the appropriate response in 32 cases (70% of all sensitive cases). 10 cases were referred to CO management for their handling, with proper follow-up from HQ to ensure cases were addressed, and 3 cases were suspended when they were found either not to be within the scope of DCA’s work or related policies or when not enough information was made available to proceed with an investigation. Furthermore, one case was referred to HQ management for follow-up and handling.

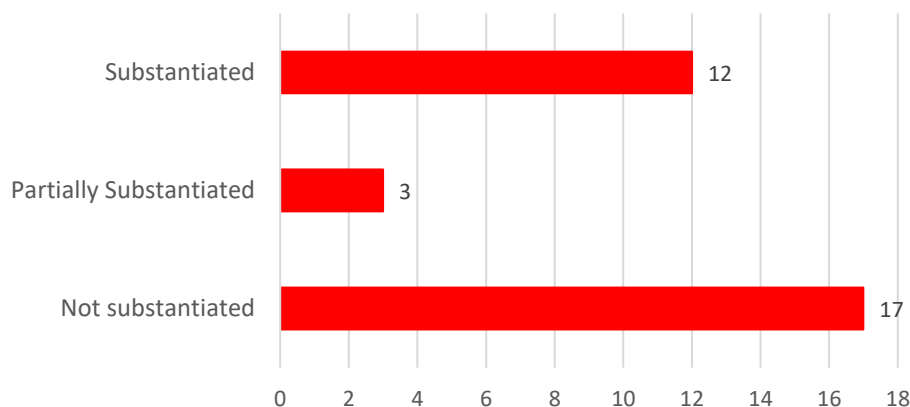
Table 7

CC response	Number of complaints
Case suspended	3

Investigation	32
Referred to Country Office Management	10
Referred to management	1
Grand Total	46

Of the 32 sensitive complaints that went to investigation, 12 (38%) were substantiated or sustained and disciplinary actions against the SoC was taken accordingly, compared to 17 cases (53%) that were not substantiated or not proven- see figure 8. A total of 3 cases were partially sustained and these entailed cases with several allegations, where some of them were sustained but others were not due to the lack of evidence.

Figure 8



As per the data shown in Table 4 above, in 2022, thirteen complaints involved the behaviour of DCA staff which constituted minor breaches of the CoC or related policies and were not related to sexual misconduct. Eight cases were duly investigated and concluded, and recommendations for improvements were shared by the CC with the manager of the SoC, with one case still open. Only one of these cases was substantiated and disciplinary actions against the SoC was taken accordingly. The other seven cases were not substantiated. Four of the thirteen cases were however less serious and were referred to the CO management for handling, and one case was suspended.

Ten complaints involved suspicion of sexual misconduct in 2022 (harassment, exploitation, or abuse), where nine were related to DCA's own employees and one to a DCA partner employee. Six cases went to investigations in total, and based on the findings of the investigations, three were substantiated and the other three not substantiated. The cases that were substantiated led to disciplinary actions against the SoCs. Two other cases were referred to CO management as they were less serious and sometimes the complainant did not agree to proceed with an investigation, and two other cases were suspended.

Regarding the 23 sensitive complaints that were related to confirmed or alleged breaches of DCA's anti-corruption policy, sixteen were related to DCA's own employees and seven to a DCA partner employee. Overall, 18 cases went to an investigation where 8 were substantiated, 3 were partially substantiated and 7 were not substantiated (no evidence of fraud but non-compliance with DCA's procurement guidelines for example). The cases that were substantiated led to disciplinary actions against the SoCs, including but not limited to termination of employment, contract not being renewed, termination of partnership agreement with a partner and requesting the partner to refund the money, etc. Four other cases were referred to CO management as they were either less serious or because it was reported to HQ after confirming the evidence of fraud and hence the CO needed to follow-up on the

corrective actions, and one other case was referred to HQ management for follow-up.

DCA’s Accountability and Complaints Advisor categorised the sensitive complaints received that went to investigations according to one of three loss types: reputational, financial or a combination of both reputational and financial. If none of these were applicable, then none was selected. Arguably, all suspected misconduct can carry an element of potential reputational and financial loss with it. Accordingly, the type of loss that is ultimately recorded can be subjective. Findings are illustrated in table 8, reflecting that out of the 17 cases that had a loss resulting from the misconduct, 9 entailed a financial loss to DCA, 6 entailed reputational losses, and 2 cases entailed losses from both types (financial and reputational).

Table 8

Types of losses resulting from misconduct	Number of complaints
Financial	9
Reputational	6
Both	2
None	15
Grand Total	32

Investigations can be lengthy and properly conducted professional investigations are generally more time consuming. Their length could be reduced with additional resources and capacity to investigate mainly in DCA country offices, which is an area of focus for DCA in 2023 with the aim of having additional trained investigators. Table 9 shows the processing time for handling complaints that went to investigations, or the number of calendar days passed between the date a case is received and the date the case was considered closed in the database in 2022, after an investigation was concluded and actions were taken accordingly. Consequently, 19 out of the 32 cases (59%) that went to investigations were closed within less than 90 days, which is the recommended timeline to complete investigations. The time to complete an investigation depends upon its complexity, and the availability of witnesses and documents; therefore, 13 cases (41%) that went to investigations took more than 90 days to be concluded and closed.

Table 9

Processing time for case closure	Number of complaints
30 days or less	6
30 to 60 days	7
60 to 90 days	6
More than 90 days	13
Grand Total	32

As part of closing the loop when handling sensitive complaints, DCA considered what was learnt from each case and implemented measures to minimise the risk of the same situation to re-occur. All cases that went to investigations were duly investigated with the support from the HQ CC and reported to the donor in concern.

b. Complaints received by COs in 2022

Besides the 96 complaints received by HQ in 2022, a total of 5,806 complaints were received globally as reported by COs in the Annual Global Report 2022, of these 265 were categorised

as operational complaints, with the rest being requests for assistance or request for information. There is almost a double increase in the number of complaints received globally as compared to the number reported in 2021 (2,630), which can reflect increased awareness among community members and people supported by DCA in COs around the availability of DCA's complaints systems. This reflects the increased efforts that DCA has been doing in 2022 to respond or address one of the observations from the CHS audit, which is that information regarding DCA Code of Conduct and staff behaviour is not always shared with communities. Additional efforts will be made in 2023 to ensure that DCA succeeded in addressing this observation (further explained under section 8 below). Due to the nature of the questions in the Annual Global Report 2022, there is limited data on the categorisation of complaints received by COs. This will improve in 2023 with the roll-out of the complaints quarterly reporting template where COs will report the number of complaints received per quarter by category of complaint. This will ensure more accurate reporting and will offer opportunity for additional analysis and trends.

Examples of operational complaints received by COs globally include Partner dissatisfaction with contracts and general cooperation, DCA staff behaviour not classified as a sensitive complaint, complaints about advocacy or policy statements, complaints about fundraising activities, complaints about the quantity or quality of DCA services, complaints about not being included in beneficiary lists, complaints about delays in recruitment process, and complaints about delays in cash distribution.

5. Focus Areas from 2022

In 2022, DCA strengthened its Accountability and Complaints system at both HQ and Country Office (CO) level. The 2021 Complaints Report pointed at some activities to be implemented in 2022. Below is a brief update on each activity.

Staff and Partner Capacity Strengthening

a. Country Offices (COs) trained in the Complaints System and Accountability Framework

This was an outstanding activity from 2021, delayed or postponed because of the COVID-19 pandemic. Hence, support was provided to the remaining 4 COs [Central African Republic, Democratic Republic of Congo (DRC), Ethiopia, and Mali] in 2022 to provide employees with a solid understanding of the policies that frame the complaints system as well as a strategic insight into the Core Humanitarian Standard (CHS) workplan at organisational and operational levels. DCA's Accountability and Complaints Advisor and DCA's Compliance Coordinator visited DRC in person in March 2022, where they delivered a training aiming at capacity strengthening of DCA DR Congo Country Office Staff and local implementing partner ADIC in the areas of the Core Humanitarian Standard, Data Protection and Complaints System. Further support will be provided to Central African Republic, Ethiopia and Mali through the delivery of additional trainings in 2023, based on their needs.

b. DCA's Accountability and Complaints Focal Point Webinars

The Accountability focal points were first nominated in 2017 and since 2020, DCA's Accountability and Complaints Advisor and the Compliance Coordinator have arranged online quarterly webinars, where topics related to CHS, complaints system, safeguarding is discussed, and experiences are shared between the focal points. The quarterly webinars continued to be organized and delivered throughout 2022. The webinars were assessed where the results reflect that they have been very successful and hence they will continue in 2023. Furthermore, in December 2022, a face-to-face

Global SQM Workshop was organized in Lebanon during which, among others, the accountability focal points as well as the complaints focal points, participated.

c. Safeguarding and protection session - including PSEA and strategy for reaching communities with information about expected staff behaviour

The 2021 CHS Recertification Audit vocalized the challenge of reaching people supported by DCA with information on expected staff behaviour. The accountability and complaint focal point webinar discussed the opportunity of informing communities and people supported by DCA of PSEA and expected staff behaviour of DCA during activities, such as cash or kits distributions. Further progress on this is expected in 2023 (explained under section 8). Furthermore, during the Global SQM Workshop organized in Lebanon in December 2022, a session was delivered focusing on PSEA guidelines, aiming at: 1) Preparing COs for increased focus by donors on improving working with PSEA, 2) Discussing best practices on working with PSEA and relevant minimum operating standards, and 3) Introducing the PSEA assessment tool as it is being applied in Palestine.

d. Establish opportunities for partners to undertake the CHS self-assessment

In 2021, DCA initiated a dialogue with the CHS Alliance to plan a strategy on how to support its partners in undertaking the CHS self-assessment. Parallel to this, the CHS Alliance initiated better solutions for how organisations can measure how they meet the nine CHS Commitments. In 2022, the CHS Alliance have launched the first webinar for Civil Society Organizations (CSOs) on how to undertake a CHS Verification and conduct a CHS self-assessment following a step-by-step methodology. Consequently, DCA aimed to focus more on localization in 2022 and identify DCA partners to initiate this process. As a result, one of DCAs partners in Palestine (Women's Affairs Center-Gaza (WAC)) applied for a CHS membership in 2022, and the partner was invited to attend DCA's Accountability and Complaints Focal Point Webinar in November 2022 to speak about their experience. Their presentation inspired the other focal points, and it was agreed that the process and result of WAC will be communicated in a next webinar in 2023. Going forward, more focus could be made on how to create awareness and support DCA partners in undertaking the CHS self-assessment. The result of the CHS self-assessment can also be used strategically to request DCA for financial and capacity support where potential weaknesses of the organization is found.

Development and Updates of Policies and Procedures

e. Finalise and communicate complaints and whistleblower system and policy

In line with the new EU whistleblower law, DCA established a whistleblower system that allows DCA employees to submit anonymous complaints. DCA contracted a consultancy firm to support in drafting a whistleblower policy. In 2022, a DCA Whistleblower and Complaints Handling Policy has been developed and was approved by DCA's Board on 3rd June 2022. The policy was presented at the Global SQM workshop in Lebanon in December 2022. A Standard Operating Procedure (SoP) has been developed for the Whistleblower Scheme and the Complaints System and a great focus on awareness around the policy and the SoP will be implemented and delivered in 2023 to HQ staff and COs.

DCA has asked PricewaterhouseCoopers (PwC) to support developing a software where all complaints will be received and categorised automatically based on inputs from the whistleblower or complainant. This will be accessible at DCA's website and launched in 2023.

f. Develop and implement appeal procedure

In order to ensure due process and accountability, the DCA complaints system offers

the Subject of Concern (SoC) to appeal. DCA developed a SoP for the Appeal procedure in DanChurchAid complaints system, which was finalised and approved in October 2022. The SoP offers guidance on who can appeal, what can be appealed and how to appeal.

g. Revise DCA's Anti-Corruption Policy

This activity was planned for 2022. The revision of the policy started in September 2022, however, due to staff turnover, the finalisation of the revised policy version was delayed. DCA will finalise and approve the revised version of the Anti-Corruption Policy in 2023.

h. Develop and implement action plan based on findings from the CHS re-certification audit

The CHS recertification report highlighted some recommendations called Corrective Action Requests (CARs) and Observations (OBS) that DCA will work to improve. DCA's complaints advisor and compliance manager developed an action plan and a specific progress report (STD022) based on the action plan, where the latter has been shared with all relevant colleagues for their update in November 2022 and will be shared with the CHS auditors during the audit in 2023. This ensured a strong organisational focus and ownership in implementing the actions within the organisation.

i. Develop complaint referral procedure for complaints that are registered in the DCA complaints system but do not fall within its scope

One of the CARs from the CHS audit noted that DCA had no formal referral mechanisms in place for complaints that did not fall within the scope of the organisation or its partners. To address this CAR, DCA has developed new guidance documentation on the DCA referral mechanism in 2022. As stated in the guidance the mechanism "is based on the Inter-Agency Standing Committee (IASC) Community-Based Complaint Referral Mechanism to strengthen its compliance with a survivor-centered approach as well as good global practices on PSEA". Furthermore, the guidance is accompanied by a new referral form and both documents will be introduced during the first webinar of 2023 in March. This documentation will replace previous DCA documentation on referral mechanisms, as it includes further details on the process and a link for the IASC template that can be used to refer to other agencies to standardise the process.

These newly developed documents will also compliment the efforts that have been made during the last years to address this CAR such as increased awareness raising in webinars and during the workshop in Lebanon with the presentation of minimum operating standards when working with PSEA.

Responding to Changes in Donor Compliance Requests

j. Expand the questions for the Annual Global Report related to the complaints system

One of the CHS Observations was about DCA's Annual Global Report 2021 where DCA needed to expand the analysis related to DCA's complaints system. Accordingly, in 2022, DCA revised the complaints section in the Annual Country Programme Report to be filled by COs, with a detailed insight into the operational complaints in the COs and the number of complaints that partners have received and handled. These will be reflected in the Annual Global Report 2022, to be issued in May 2023.

k. INGOs report Sexual Abuse and Harassment (SEA) cases to ECHO

ECHO established a requirement for all INGOs to report SEA cases. DCA followed this

requirement in 2022 and informed ECHO on SEA cases involving ECHO funding. To safeguard personal information, it should be noted that only the country and number of cases are communicated. The 2022 report will be submitted to ECHO in April 2023.

Network and Learning

l. Improve e-learning platform

During 2022, DCA's Learning Lab put great efforts to develop meaningful reporting mechanisms and dashboards to be used by Compliance officers, line managers and others. The system will improve the e-learning platform Fabo to better track the number of employees who have completed the available training. The system will have a proper integration set up with DCA's Information Technology department in 2023.

m. Set-up an additional access to the digital complaints handling system for Syria CO (Pilot)

During 2022, DCA's IT department in HQ set up an additional access for Syria CO based on their request to DCA's Official complaints response mechanism system for handling all digital complaints submitted by staff, people supported by DCA, suppliers and community members. The system is powered by Zendesk (an American company), is compatible with and works very well with Microsoft (DCA's Official ERP platform). This pilot was further explained and presented during the accountability and complaint focal point webinar in June 2022.

n. Fight Against Facilitation Payments Initiative (FAFPI) webinars

The FAFPI is a collective action uniting companies and organisations in the fight against demands for facilitation payments. The initiative began in 2018 in collaboration with the Danish Ministry of Foreign Affairs (MFA), Confederation of Danish Industry, companies, and NGOs as a collective multi-stakeholder response to the challenge of the individual company or organisation who is unable to address facilitation payments on its own. In 2022, meetings or webinars were held either face to face or online. The members took turns in hosting the events, whereby in September 2022, DCA hosted the meeting in DCA premises.

o. Ensuring that DCA CC processes are working in accordance with the General Data Protection Regulation (GDPR)

During 2022, in consultation with other colleagues, DCA's data protection consultant updated the overview of processes that contain personal data in SQM. As such, DCA's data protection consultant followed up with DCA's complaints advisor to ensure that the DCA CC works according to the GDPR. The drafted risk assessment revealed that processes concerning complaints were all "low risk"-processes.

6. Responding to the CHS and other External Reviews and Audits

2020 European Civil Protection and Humanitarian Aid Organisation (ECHO) HQ Audit

The 2020 audit commissioned by the ECHO for DCA HQ recommended that DCA develop a whistleblower policy and update its anti-corruption policy. Both recommendations were addressed in 2022 with the rollout of the DCA Whistleblower and Complaints Handling Policy and the SoP for the Whistleblower Scheme and the Complaints Handling System. The revision of the Anti-Corruption policy was initiated in September 2022, and the policy will be finalised and approved in 2023.

CHS Maintenance Audit

The CHS Maintenance Audit was implemented remotely between February and March 2022. The focus was CO level in three different countries: South Sudan, Zimbabwe, and Kenya. The auditors conducted interviews with a select number of HQ and CO staff, and additional documentation was reviewed. While no major non-conformities were found, the auditors made several observations and two recommendations called Corrective Action Request (CAR) related to complaints and accountability that DCA must address. The first CAR is related to complaint handling systems and that DCA does not systematically ensure that its partners have functioning complaint handling systems in place. To address this CAR, DCA rolled out in 2022 the developed complaint handling system guidance note with actions for its complaint focal point to support DCA partners in setting up and quality assuring their complaints systems. DCA also updated the Partner Assessment Tool to make sure partners' complaints system capacity is assessed on an annual basis. Furthermore, specific questions were added for the annual report template, where the number of complaints received by partners should indicate a functioning complaint system so follow ups can be made on an annual basis. Finally, there are additional plans to address this CAR in 2023 which are explained in the relevant section of this report (section 8).

The second CAR noted that DCA had no formal referral mechanisms in place for complaints that did not fall within the scope of the organisation or its partners. To address this CAR, DCA has developed new guidance documentation on the DCA referral mechanism in 2022. Furthermore, the guidance is accompanied by a new referral form and both documents will be introduced during the first webinar of 2023 in March. This documentation will replace previous DCA documentation on referral mechanisms, as it includes further details on the process and a link for the IASC template that can be used to refer to other agencies to standardise the process.

The commitment to CHS is first of all owned by Senior Management. At HQ, there is the Accountability and Complaints Advisor and furthermore, each country office has appointed an Accountability Focal Point, whose responsibilities are, among others, awareness, and implementation of the CHS. All COs have developed an Accountability and Improvement Plan (AIP) which is a CHS workplan where all commitments and indicators have been translated into concrete action points, in relation to the observed CARs from the CHS audits. The initiative to take the AIP to become more of a management tool has been discussed internally with DCA's HQ management, and this was taken into account while developing DCA's global strategy 2023-2026 and was reflected under section 8 Fit for Purpose in the strategy (sub-section 08.4 Quality Management and Accountability).

7. Sector and Cross-sectoral Networks

CHS Alliance

DCA is a member of the CHS Alliance which is a global alliance of humanitarian and development organisations that are verified according to the CHS or are aspiring to be verified. As an overarching organisation, the CHS Alliance facilitates annual gatherings as well as technical workshops to support its members. During 2022, DCA's Accountability and Complaints Advisor and Compliance Coordinator joined the regular annual general assembly as well as the first webinar for national CSOs on how to undertake a CHS Verification and conduct a CHS self-assessment following a step-by-step methodology.

Fight Against Facilitation Payment Initiative

Throughout 2022, DCA continued the collective action initiative FAFPI together with the Danish MFA, the Danish Confederation of Industries, and several other cross sectoral organisations and companies. DCA took an active role in driving this initiative forward from

idea to reality since it was first initiated by Danfoss and the Danish MFA. DCA saw 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 will collect evidence for challenges related to facilitation payments to create awareness within the Danish MFA and eventually to gain support for confronting and preventing facilitation payments in the future. DCA also registers and reports these cases bilaterally to the Danish MFA, if their funds are involved. Quarterly face-to-face and online meetings were conducted in 2022. The group exchanged experiences on how to ensure effective reporting of facilitation payments and how to incorporate FAFPI in trainings to employees, establishing a reporting system, training toolkit, and procedures for getting new members.

Globalt Fokus PSEAH Working Group

DCA is a member of the Globalt Fokus PSEAH Working Group. In 2022, DCA continued its contribution to the PSEAH working group under Globalt Fokus that was originally funded by Danida to develop common CSO Guidelines on safeguarding. In 2022, DCA's Accountability and Complaints Advisor attended the meetings organised by the working group, which offered a valuable exchange opportunity for its members.

8. Planned Focus Areas for 2023

Below activities are planned to be implemented in 2023. Follow-up on each of the focus areas, will be reported on in next year's report.

1. Develop and roll out a Guidance on Information Sharing about DCA Code of Conduct (CoC) and expected staff behavior, detailing the process COs are expected to follow during 2023 to ensure that information about the complaints system, DCA's CoC and expected staff behavior are easily visible, accessible and frequently communicated. The new guidance document will be introduced to focal points at the first webinar in March 2023.
2. Organise one-on-one meetings with country offices in order to ensure that all DCA COs have functioning complaints handling mechanisms in place. The HQ advisor will develop a compliance checklist to guide the meetings with COs aiming at assessing their compliance with DCA's complaints handling guidelines, assessing their practices and identifying gaps and support needs.
3. Update DCA's guidelines and SoPs for complaints handling since the previous versions are from 2018. The updated versions will reflect the different categories of feedback and complaints (i.e., Request for information, Request for support/assistance, Minor operational complaint, Major operational complaint or sensitive protection issue, Complaint about violation of DCA's CoC and policies) as well as suggested timelines to close cases or the feedback loop.
4. Develop a complaints quarterly reporting template for COs to improve the reporting of number of complaints received with their categories. Ensure that COs use the quarterly reporting template as it will allow to improve the analysis in terms of categorization and also ensures better follow-up with COs who will have more standard tracking for the cases, and they will be able to report the number of complaints among partners to help them identify if partners' complaints mechanisms are working effectively.
5. Improve the level of analysis of DCA's online complaints tracking system (Zendesk) to facilitate dashboards or analysis.
6. Revise and roll-out DCA policies (Anti-Corruption, Child Safeguarding, PSEA and DCA's CoC).
7. Update DCA onboarding courses to reflect the changes or revisions in the policies and develop a refresher training on PSEAH, which will be mandatory for staff to attend on a yearly basis. Also, develop a mandatory e-learning course focusing on the difference

between the Whistleblower Scheme and the Complaints System, how to access the systems, and what the Whistleblower or complainant can expect after submitting a complaint.

- 8.** Revise and develop standard posters on DCA's CoC and expected staff behavior, DCA's complaints system and PSEAH and share them with COs.
- 9.** Build the capacity of Complaints Focal Points and other internal staff in COs on investigation, since investigation training was flagged as a need by many COs, especially in light of the increase in the number of complaints raised. HQ will lead the process of organising an investigation training in 2023 delivered by a specialised third party.
- 10.** Support COs in having a survivor-centered approach after conducting a mapping of services and following a clear referral pathway for cases that need professional care.
- 11.** DCA is planning to manage the Whistleblower Scheme within the organisation, in a newly established Internal Audit Unit that will be given this responsibility in 2023. Once established, the guidelines for the clear separation of roles and responsibilities between DCA complaints advisor and the whistle blower advisor will be rolled out.

