



# **DanChurchAid**

## **Complaints Report 2023**



**DCA Strategy and Quality Management Unit**

**March 2024**

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## Abbreviations

AIP - Accountability Improvement Plan  
CAR - Corrective Action Request  
CC - Complaints Committee  
CHS - Core Humanitarian Standard  
CO - Country Office  
CoC - Code of Conduct  
CoP- Community of Practice  
CPI- Corruption Perceptions Index  
CSOs - Civil Society Organizations  
DCA - DanChurchAid  
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  
IASC - Inter-Agency Standing Committee  
MFA - Ministry of Foreign Affairs  
NGOs - Non-Governmental Organisations  
OBS - Observation  
PAT- Partnership Assessment Tool  
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 2023* is DanChurchAid's (DCAs) 19th 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 2023, highlights the initiatives launched, and presents what is planned to commence in 2024.

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 received.

In this report, all complaints related to DCA's Code of Conduct (CoC) and its related policies Prevention of Sexual, Exploitation, Abuse and Harassment (PSEAH), 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. 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 Human Resources (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 Prevention of Sexual Exploitation, Abuse and Harassment

(PSEAH) Policy, 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 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**

Similar to the report from 2022, DCA's Complaints Report 2023 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 reports of 2021 and 2022.

### **4. Complaints Received in 2023**

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. As of 2024, the quality assurance exercise will become the responsibility of DCA's newly established Internal Audit Unit, reporting directly to DCA's board.

#### **DCA Complaint's Systems and Complaints Received Globally**

##### **a. Complaints received by HQ in 2023**

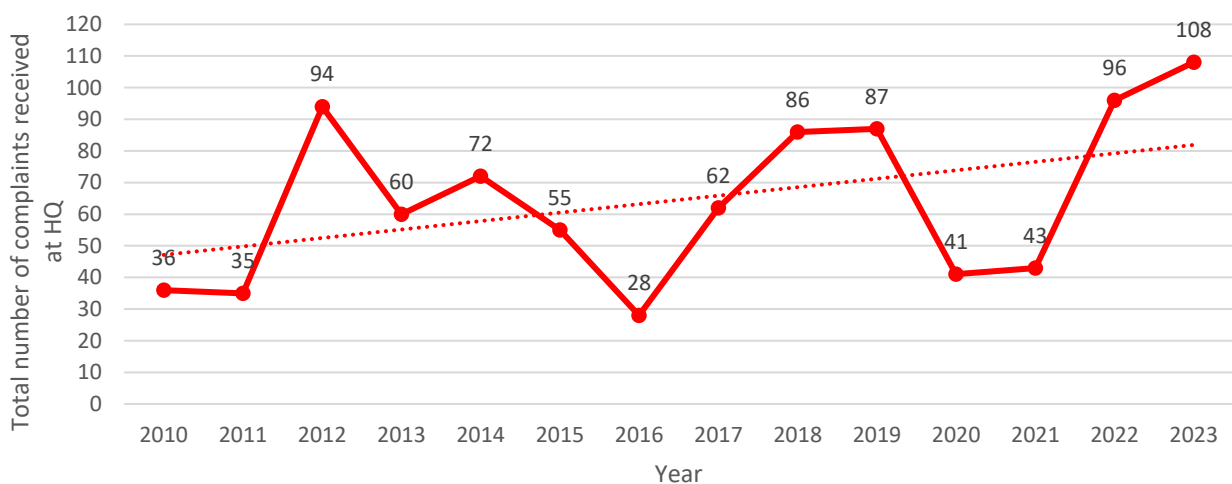
A total of 119 complaints were received by HQ in 2023, of these 53 were categorised as operational, 55 categorised as sensitive complaints, handled in collaboration with DCA's HQ Complaint Committee (CC), and 11 complaints were not handled due to lack of information where the complainant never replied and were hence removed from the analysis, giving a total of 108 valid complaints in 2023. Of these, 105 were received through DCA's complaints system (the online complaint form on the website or by email) and 3 were received through the Whistleblower Scheme.

As shown in Figure 1, this is the highest number of submitted complaints received by HQ since 2010. An explanation could be the awareness raising around DCA's complaints systems delivered to staff in Country Offices (COs) and the reminders shared by HQ to Country

Directors and Complaints Focal Points, as well as the roll-out of the revised CoC and related policies in 2023 which all include a section on the reporting mechanism in DCA. Information sharing with community members about the DCA Code of Conduct, expected staff behaviour and the complaints system was a priority area in 2023, where COs were asked to convey this information to community members in a simple language to raise their awareness about the availability of the complaints system and what can be reported. Consequently, this could be one of the reasons for the further increase in the number of complaints received in 2023 compared to 2022. Another explanation could be that field activities were resumed in 2022 and 2023 after the COVID-19 pandemic and restrictions during 2020 and 2021, resulting in an increase of received complaints globally in 2022 and 2023, after DCA staff returned to working from the offices and physical monitoring of checks and balances and internal controls were reinitiated.

Figure 1: Annual submission of complaints to DCA’s Head Office

Source: DCA’s Complaints System Platform (Zendesk), 2023



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 January and May recorded the highest numbers of complaints in total (22 and 14, respectively), yet the highest number of sensitive complaints was recorded in November 2023 (7 sensitive complaints).

Table 1: Overview of category of complaints by month in 2023

Source: DCA’s Complaints System Platform (Zendesk), 2023

Month	Operational	Sensitive	Grand Total
January	17	5	22
February	4	5	9
March	4	6	10
April	2	4	6
May	12	2	14
June	4	6	10
July	1	3	4
August	3	6	9
September	1	5	6

October	0	5	5
November	4	7	11
December	1	1	2
<b>Grand Total</b>	<b>53</b>	<b>55</b>	<b>108</b>

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 or re-assessment 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). Similar to the data from 2022, it is encouraging to see that the majority of sensitive complaints in 2023 came from DCA staff (mainly programme staff, followed by management and operations 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 staff use and trust DCA's complaints system, which is essential to ensure that it is adequately promoted within the organisation. Additionally, this may be the result of the focus on awareness raising among DCA staff in 2023 after working with the focal points in COs on the roll-out of some communication material to increase the visibility around DCA's complaints system, DCA's CoC and expected staff behaviour, with the aim of encouraging staff to report any suspected misconduct.

Table 2: Overview of the type of complainants per complaint category in 2023  
Source: DCA's Complaints System Platform (Zendesk), 2023

<b>Types of complainants</b>	<b>Operational</b>	<b>Sensitive</b>	<b>Grand Total</b>
Anonymous	4	7	11
Community member (not supported by DCA)	40	1	41
Current DCA staff (management)	0	2	2
Current DCA staff (operations)	1	2	3
Current DCA staff (programme)	1	11	12
People supported by DCA	3	1	4
DCA implementing partner	0	3	3
DCA supplier	0	4	4
DCA volunteer	0	1	1
Donor	0	3	3
Focal points in country offices on behalf of complainant	0	9	9
Former DCA staff	1	5	6
Other external stakeholder	0	1	1
Others (i.e. job seekers, etc.)	3	5	8
<b>Grand Total</b>	<b>53</b>	<b>55</b>	<b>108</b>

On the other hand, the majority of operational complaints submitted came from community members not supported by DCA (40 in 2023 compared to 32 in 2022). Three of the operational complaints and one of the sensitive complaints came from people supported by DCA, compared to four and none respectively in 2022. 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. 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. This is expected to increase following the official launching of the updated platform for the DCA Complaints System and the Whistleblower Scheme in 2024, which will be accompanied by information sharing to all staff, the official launching of the DCA standard posters or visibility material on the reporting channels (locally and globally), together with messaging on the CoC, PSEAH, Anti-corruption and expected staff behaviour. These posters will include QR codes to facilitate the access of community members to the online reporting forms for sensitive complaints. During 2024, all COs will be requested to install the standard posters in the DCA offices and their areas of implementation (safe spaces, community centres, etc.).

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.

During 2023, three additional types of complainants are reflected in the table, whereby 4 sensitive complaints were submitted by DCA suppliers, 1 by a DCA volunteer and 3 sensitive complaints were submitted by donors, compared to 0 complaints submitted by these types of complainants in 2022.

Anonymous complaints constituted 10% of all complaints submitted to HQ in 2023, compared to 6% in 2022. 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: Overview of complaints received in Head Office per Country in 2023  
Source: DCA’s Complaints System Platform (Zendesk), 2023

DCA CO	Operational	Sensitive	Grand Total
Bangladesh		3	3
Cambodia		3	3
Central African Republic		6	6
Denmark	12	3	15
DR Congo	2	4	6
Ethiopia		1	1
Iraq		5	5
Kenya	1	3	4
Lebanon		1	1
Libya	2	1	3
Nepal		1	1
South Sudan		8	8
Syria	31	10	41
Uganda	3	3	6
Ukraine		2	2
Unspecified	1		1
Zimbabwe	1	1	2
<b>Grand Total</b>	<b>53</b>	<b>55</b>	<b>108</b>

More than half of operational complaints received in 2023 were coming from Syria (31



complaints) followed by Denmark (12 complaints). Similarly, the most reported operational complaints in 2022 came from Denmark (28 complaints) followed by Syria (10 complaints). The two DCA COs that had the highest number of sensitive complaints recorded in 2023 were Syria (10 complaints) followed by South Sudan (8 complaints), compared to Central African Republic and South Sudan in 2022 (8 complaints each). Palestine was the only country where DCA is operating but no complaints were registered or received by HQ in 2023. DCA has two joint country programmes managed and led by Norwegian Church Aid in Malawi and Zambia, and therefore all sensitive complaints go to their systems.

### Operational complaints in Denmark

In Denmark, DCA dealt with 12 operational complaints in 2023, compared to 28 complaints in 2022, see figure 2. The operational cases received through the HQ complaints system had the following categories: Second hand: 0; Telemarketing: 6; Parish Collection: 1, Web Shop: 3 and Others: 2. There is a decrease in the number of operational cases in Denmark compared to the data from the previous years. Similarly, the number of operational cases related to DCA second-hand shops continued to decrease in 2023: 0 complaints in 2023, compared to 5 operational complaints received in this category in 2022. This could be a potential improvement where DCA HQ and the head of the shops handled and resolved the complaints received in 2021 and 2022 and gave remarks/observations to DCA’s volunteer staff working in the shops to avoid further complaints or dissatisfaction with services.

Figure 2: Annual submission of operational complaints to DCA’s Head Office

Source: DCA’s Complaints System Platform (Zendesk), 2023

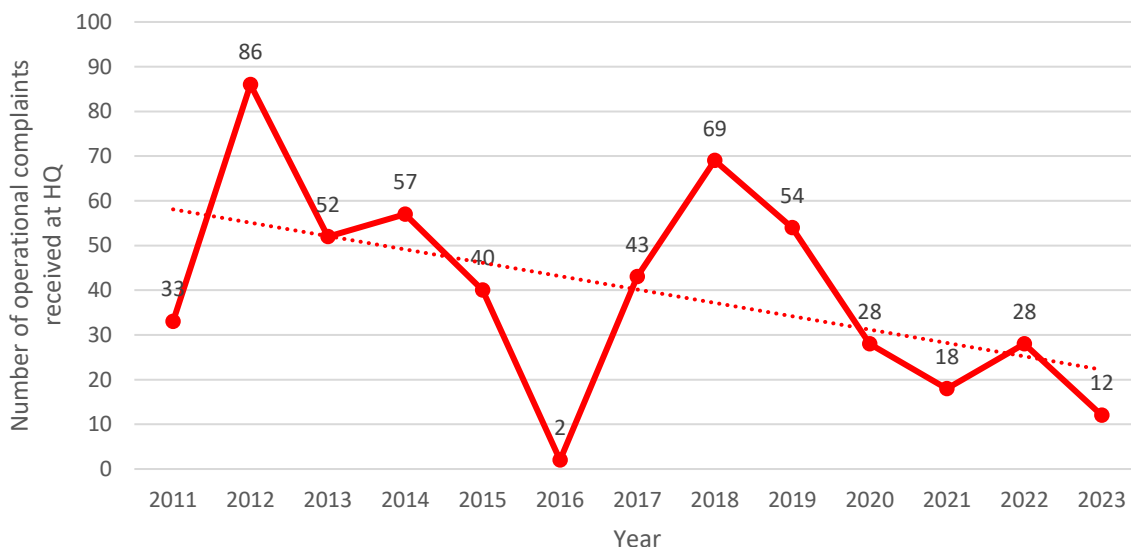
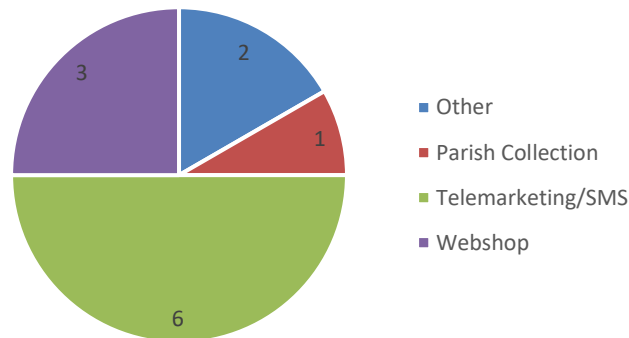


Figure 3 presents an overview of operational complaints from Denmark received in HQ in 2023 and their categories. The complaints falling under Telemarketing/SMS decreased from 13 in 2022 to 6 in 2023, where fewer complaints came from people who wished to be taken off the call-lists and these were addressed. Most of the inquiries about data protection are not actual complaints, but instead sent via DCA’s data protection email address ([dataprotection@dca.dk](mailto:dataprotection@dca.dk)) handled by the DCA Digital Supporter in the Digital and Business Development department. These inquiries are related to data subjects 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 in 2023. DCA is still waiting for a final decision on a case from 2022 that is being processed by Datatilsynet.

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

the telemarketing department in Aarhus. These complaints are tracked by the Engagement department in HQ. In total, 5 operational complaints were received from customers in the shops in 2023 and were regarding the prices in the stores.

Figure 3: Overview of the operational complaints in Denmark in 2023  
Source: DCA's Complaints System Platform (Zendesk), 2023



DCA addressed all operational complaints received in HQ 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 55 sensitive complaints received in 2023, 21 were related to a breach of DCA's Anti-Corruption Policy (19 in 2022), 15 related to a breach of DCA's Code of Conduct (13 in 2022), 3 related to a breach of DCA's PSEAH Policy (10 in 2022), and 9 were considered as breaching both DCA's CoC and Anti-Corruption Policy (4 in 2022) as the complaints had allegations pertaining to both. Two additional categories emerged in 2023, which are sensitive complaints pertaining to breaches of both the DCA Anti-Corruption Policy and the Procurement guidelines (5 complaints) as well as complaints which included allegations pertaining to the DCA CoC, the DCA PSEAH Policy and the DCA Anti-Corruption Policy all together (2 complaints in 2023). Table 4 shows the types of suspected misconduct registered in HQ in 2023, 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 67% of complaints submitted entailed suspicions and allegations around corruption (37 in total), and hence this was the most frequent type of misconduct reported for sensitive complaints. This is an increase from the numbers reported in 2022, where 23 complaints in total entailed suspicions and allegations around corruption (50% of all submitted sensitive complaints in 2022).

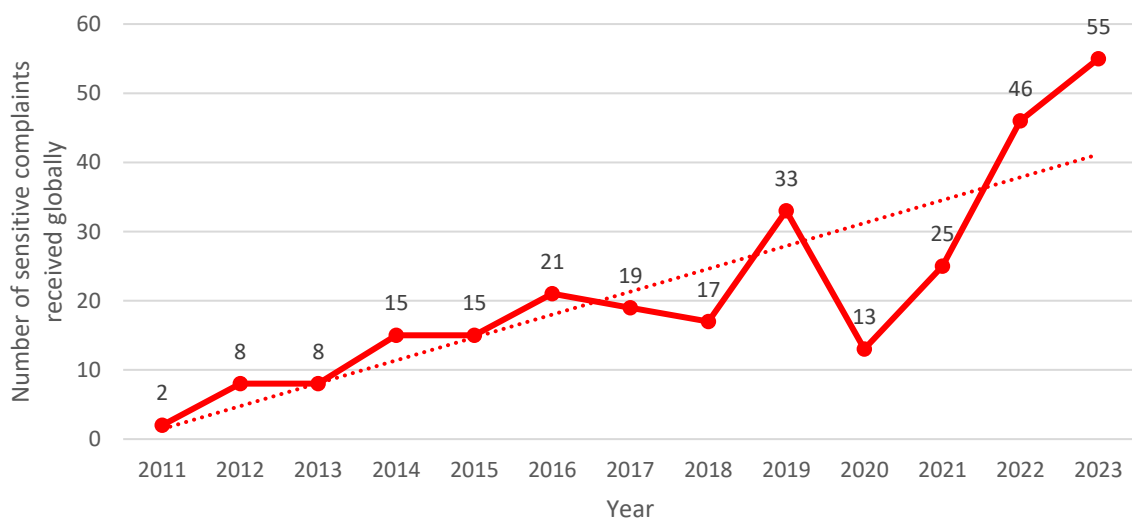
The sensitive complaints related to alleged or suspected breaches of the CoC, and underlying policies are highly sensitive for the persons involved. DCA does not report publicly on these cases out of respect for the safety and legal rights of those involved.

Table 4: Overview of the types of misconduct among sensitive complaints in 2023  
 Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

Type of misconduct	Number of complaints	Percentage out of all complaints
Breach of Anti-corruption policy	21	38%
Breach of CoC	15	27%
Breach of CoC and Anti-corruption policy	9	16%
Breach of Anti-corruption policy and procurement guidelines	5	9%
Breach of PSEAH policy	3	6%
Breach of CoC, PSEAH policy and Anti-corruption policy	2	4%
<b>Grand Total</b>	<b>55</b>	<b>100%</b>

DCA experienced an increase in the number of sensitive cases received in 2023 compared to 2022 -see Figure 4, where the number in 2023 was the highest number of sensitive complaints recorded since 2010.

Figure 4: Overview of the submission of sensitive complaints per year  
 Source: DCA's Complaints System Platform (Zendesk), 2023 and Annual Complaints Reports from Previous Years



Regarding the continuous increase in sensitive complaints, an explanation could be the awareness sessions on the complaints system, held throughout the year with most COs. This made the process for submitting complaints clear to all employees, including information on how to report, especially after the launch and roll-out of DCA Information Sharing Guidelines on the DCA CoC and Expected staff behaviour as well as the roll-out of the revised CoC and related policies in 2023, which all include a section on the reporting mechanism in DCA. The increased awareness was also the result of the DCA standard posters or visibility material on the reporting channels (locally and globally), together with the messaging on the CoC, PSEAH, Anti-corruption and expected staff behaviour, which were developed in 2023 and communicated to COs. Furthermore, DCA Complaints Advisor delivered tailored trainings during 2023 to some COs based on their requests, and this included awareness raising on the DCA Complaints System and the Whistleblower Scheme. 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. This is one of the commitments in the DCA

CoC and the DCA Complaints Advisor focused on this commitment during the delivered trainings. Another factor contributing to this steady increase could be the growing emphasis on complaints systems in humanitarian contexts in recent years, where most organisations are establishing mechanisms for communities affected by crises to voice their concerns, provide feedback, and submit complaints. This also mean communities and partners are increasingly becoming aware of and have more experience using these mechanisms. One more explanation could be that field activities were resumed in 2022 and 2023 after the COVID-19 pandemic and restrictions during 2020 and 2021, resulting in an increase of received complaints globally in 2022 and 2023. For instance, the internal controls were operational again in 2022 and 2023 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 as of 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 5 reflects the breakdown of the 5 complaints entailing breaches of the PSEAH policy by the country office they were reported from. Consequently, 3 complaints entailing SEAH allegations were reported from South Sudan and 2 from DR Congo. DCA can see some similarities in high-risk countries, with the two DCA COs where the SEAH allegations were reported in 2023 being the countries on top of the list in both the CHS Alliance SEAH Harmonised Data Collection and Reporting Scheme<sup>1</sup> and the Inter-Agency Standing Committee (IASC) SEA Risk Overview<sup>2</sup> (e.g. Syria, DR Congo, South Sudan, among others). Similarly, in 2022, the DCA COs with the most frequently reported incidents of SEAH were DR Congo (3 cases), followed by South Sudan and Syria (2 cases each).

Figure 5: SEAH cases per country in 2023

Source: DCA's Complaints System Platform (Zendesk), 2023

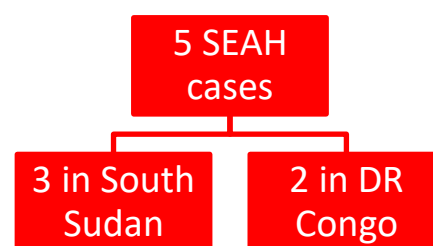


Table 5 illustrates the 37 complaints entailing breaches of the DCA's Anti-Corruption Policy disaggregated by the CO where the allegations took place in 2023. The findings reflect that the DCA COs where the highest numbers of reported corruption allegations took place in 2023 are South Sudan and Syria (6 cases each). This is in line with the findings from the 2023 Corruption Perceptions Index (CPI), showing that both countries had a similar ranking and score, meaning that corruption is thriving in these two countries. The CPI ranks 180 countries and territories around the globe by their perceived levels of public sector corruption, scoring on a scale of 0 (highly corrupt) to 100 (very clean), where both South Sudan and Syria had a ranking of 177 and a score of 13<sup>3</sup>. During 2022, the DCA CO which reported the highest number of corruption related allegations was Central African Republic (6 cases), followed by South Sudan and Kenya (4 each).

<sup>1</sup> This report presents the main findings from the data on SEAH incidents reported during the pilot- from October 1st 2022 to September 30th 2023 - by 24 organisations who tested the CHS Alliance SEAH Harmonised Data Collection and Reporting Scheme, where a total of 133 incidents of sexual exploitation, abuse and harassment (SEAH) were reported through the Scheme during this period. Source: <https://www.chsalliance.org/get-support/resource/harmonised-reporting-scheme-on-sexual-exploitation-abuse-and-harassment-findings-from-a-year-of-piloting/>

<sup>2</sup> The Sexual Exploitation and Abuse Risk Overview (SEARO) is a Composite Index that brings together indicators on a range of different factors that can influence the risk of SEA. Source: <https://psea.interagencystandingcommittee.org/iasc-sea-risk-overview-index>

<sup>3</sup> The 2023 Corruption Perceptions Index- [https://www.transparency.org/en/cpi/2023?qad\\_source=1&gclid=CjwKCAjw48-vBhBbEiwAzqrZVlfr6PyAbWxWnD4nbaPLeWiKQIV8Kk7yF6UMiNDdUJcoBtYbt4BddxoCoV0QAaD\\_BwE](https://www.transparency.org/en/cpi/2023?qad_source=1&gclid=CjwKCAjw48-vBhBbEiwAzqrZVlfr6PyAbWxWnD4nbaPLeWiKQIV8Kk7yF6UMiNDdUJcoBtYbt4BddxoCoV0QAaD_BwE)

Table 5: Overview of corruption cases per country in 2023

Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

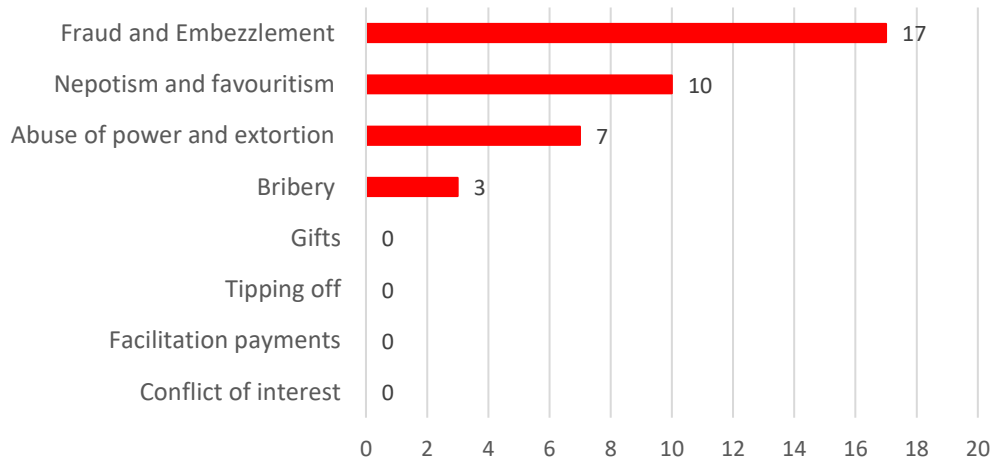
DCA CO	Number of complaints entailing corruption allegations in 2023
Bangladesh	2
Cambodia	1
Central African Republic	3
Denmark	1
DR Congo	3
Ethiopia	1
Iraq	4
Kenya	3
Lebanon	1
Libya	1
Nepal	1
South Sudan	6
Syria	6
Uganda	2
Ukraine	1
Zimbabwe	1
<b>Grand Total</b>	<b>37</b>

Figure 6 illustrates the types of misconduct breaching DCA's Anti-Corruption Policy as reported in the 37 complaints received by HQ in 2023. Fraud and embezzlement was the highest category reported (n=17), constituting 46% of all corruption related complaints reported, compared to 65% in 2022 (n=15). Although the number of complaints that entailed fraud and embezzlement allegations was comparable in 2022 and 2023, yet the percentage is different since there was an increase in the number of corruption related complaints reported in 2023 overall, with a remarkable increase in the allegations of nepotism and favouritism (either in recruitment or in procurement processes), whereby 10 complaints falling under this category were reported in 2023 compared to 1 in 2022. It is important to note that some of the reported complaints pertaining to breaches of the anti-corruption policy included multiple allegations related to different types of corruption, yet the most prominent or severe type was listed under the category field (i.e. some complaints included allegations of fraud as well as abuse of power, yet the category was marked as fraud and embezzlement as this was the most prominent reported misconduct or the main allegation in the complaint).

On the other hand, none of the complaints breaching DCA's Anti-Corruption Policy entailed allegations pertaining to facilitation payments, which is a type of corruption in many of the countries where DCA is operating. Facilitation payments are small payments made to public or other officials to expedite or secure activities and actions of a routine nature. Routine nature is here defined as activities and actions that are a part of DCA employees' daily duties and functions, however such incidents are usually under-reported and DCA will focus on this area in 2024. Similarly, no complaints involving gifts, conflict of interest or tipping off<sup>4</sup> as a type of corruption were reported in 2023.

<sup>4</sup> Tipping-off means disclosing to any other person, information or any other matter, which is likely to prejudice an investigation.

**Figure 6: Overview of corruption cases by type of corruption and misconduct in 2023**  
 Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023



To ensure transparency and compliance with donor requirements, reporting of allegations to donors was streamlined in 2023. 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, and reports of SEAH. Hence, DCA Accountability and Complaints Advisor has been deeply involved in the preparation of donor reports and dealing with detailed donor follow up in 2023.

DCA aims to collect more meaningfully, and extract data related to complainants' and subjects of concern's gender, provided the information is known (else it is recorded as Unspecified). The numbers in figure 7 reflect that the majority of complainants and subjects of concern (SoCs) for the 55 sensitive cases in 2023 are males, which is similar to the results from 2022. In some instances, one complaint involved more than one complainant or more than one SoC accused, hence the gender of all these are included in the count in figure 7.

**Figure 7: Gender of complainants and subjects of concern among sensitive complaints in 2023**  
 Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

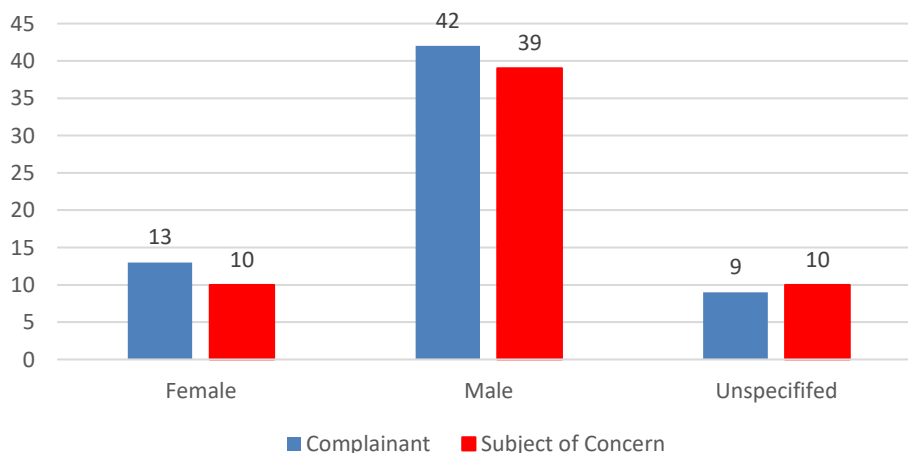


Table 6 below presents data on the types of the 59 SoCs suspected of misconduct for the 55 sensitive cases reported in HQ in 2023. Similar to the data from 2022, findings reflect that



DCA programme staff were the most complained about (20 in total in 2023 compared to 16 in 2022), followed by DCA implementing partners' staff (16 in 2023 compared to 10 in 2022) and DCA's management staff (13 in 2023 compared to 10 in 2022).

Table 6: Overview of the types of subjects of concern among sensitive cases in 2023  
Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

Types of SoCs	Total
Current DCA staff (management)	13
Current DCA staff (operations)	9
Current DCA staff (programme)	20
DCA implementing partner	16
Former DCA staff	1
<b>Grand Total</b>	<b>59</b>

Table 7 provides an overview of the status of the 55 sensitive complaints in DCA's database as of 15 March 2024. The majority of sensitive cases from 2023 were closed at the time of the annual report, contrasted to only one case that remained open.

Table 7: Status of the sensitive complaints in DCA's database in 2023  
Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

Status	Number of complaints
Closed	54
Open	1
<b>Grand Total</b>	<b>55</b>

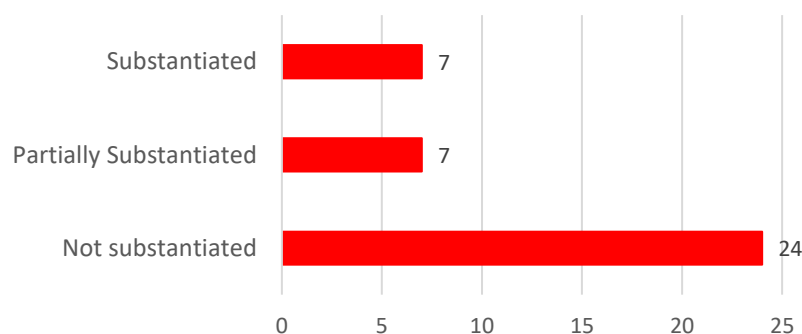
All sensitive cases received in HQ are processed by DCA's CC who meet to analyse the case and agree on the best way forward to handle or respond to the case. Table 8 below shows the CC response to the 55 recorded sensitive complaints in 2023. Out of the total of 55 cases submitted in 2023, CC decided on investigation as the appropriate response in 39 cases (71% of all sensitive cases in 2023 compared to 70% of cases in 2022). 7 cases were referred to CO management for their handling (compared to 10 in 2022), with proper follow-up from HQ to ensure cases were addressed, and 4 cases were suspended (compared to 3 in 2023) 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, 3 cases were referred to HQ management for follow-up and handling in 2023, compared to 1 in 2022, and 2 cases were referred to the relevant partner for their investigation as the partner had an effective complaints system in place and the allegations entailed one partner staff.

Table 8: Overview of the CC response to the sensitive cases received in 2023  
Source: DCA's Complaints System Platform (Zendesk), and Sensitive Complaints Tracker and Overview, 2023

CC response	Number of complaints
Case suspended	4
Investigation	39
Referred to Country Office Management	7
Referred to Head Office Management	3
Referred to partner for their investigation	2
<b>Grand Total</b>	<b>55</b>

Of the 39 sensitive complaints that went to investigation, 38 were concluded and one is still being investigated. Out of the 38 investigated cases, 7 (18%) were substantiated or sustained in 2023 and disciplinary actions against the SoC was taken accordingly (compared to 38% in 2022), while 24 cases (63% in 2023 compared to 53% in 2022) were not substantiated or not proven- see figure 8. A total of 7 cases (18%) were partially sustained in 2023 (compared to 3 in 2022) 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: Overview of the investigation outcomes for investigated sensitive cases in 2023  
 Source: Sensitive Complaints Tracker and Overview, 2023



As per the data shown in Table 4 above, in 2023, fifteen complaints involved the behaviour of DCA staff which constituted minor breaches of the CoC or related policies and were not related to sexual misconduct. Seven of these cases were duly investigated and concluded, and recommendations for improvements were shared by the CC with the manager of the SoC. Only one of these cases was substantiated and disciplinary actions against the SoC was taken accordingly. The other six cases were not substantiated. Three of the fifteen cases were however less serious and were referred to the CO management for handling, two were referred to the DCA management in HQ and three cases were suspended.

In 2023, five complaints involved suspicion of sexual misconduct (exploitation, abuse, or harassment) compared to 10 in 2022, where three were related to DCA's own employees and two to a DCA partner employee. All five cases went to investigations due to the serious nature of these allegations, and based on the findings of the investigations, only one was substantiated and the other four not substantiated. The case that was substantiated led to a disciplinary action against the SoC, since DCA has zero tolerance to SEAH and such acts are not compatible with an employment in DCA and are therefore prohibited.

Regarding the 37 sensitive complaints that were related to confirmed or alleged breaches of DCA's Anti-corruption policy, 23 were related to DCA's own employees, 1 to a DCA volunteer and 13 to a DCA partner employee. Overall, 29 cases (78%) went to an investigation where 5 were substantiated, 7 were partially substantiated, 16 were not substantiated (no evidence of fraud but non-compliance with DCA's procedures, procurement guidelines or implementation gaps were noted for example), and one is still under investigation. 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 to DCA, etc. Four other cases were referred to CO management as they were either less serious (i.e. related to recruitment procedures), one other case was referred to HQ management for follow-up, one case was suspended, and two others were referred to the partner for their own investigation with continuous follow-up from the CO and HQ on the investigation process and outcome.



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 to DCA with it. Accordingly, the type of loss that is ultimately recorded can be subjective. Findings are illustrated in table 9, reflecting that out of the 14 cases that had a loss resulting from the misconduct, 6 entailed a financial loss to DCA, 6 entailed reputational losses, and 2 cases entailed losses from both types (financial and reputational). The numbers were similar to those recorded in 2022 (9 entailed financial losses, 6 reputational, and 2 cases entailed losses from both types).

Table 9: Overview of the types of losses resulting from misconduct in 2023  
Source: Sensitive Complaints Tracker and Overview, 2023

Types of losses resulting from misconduct	Number of complaints
Financial	6
Reputational	6
Both	2
None	25
<b>Grand Total</b>	<b>39</b>

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 was an area of focus for DCA in 2023 with the aim of having additional trained investigators. Table 10 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 2023 among the 38 cases that were investigated and completed. One case reported in 2023 is still open and being investigated; therefore, it was not included in the count in table 10. Consequently, 31 out of the 38 cases (82%) that went to investigations in 2023 were closed within less than 90 days, which is the recommended timeline to complete investigations (compared to 59% in 2022). The time to complete an investigation depends upon its complexity, and the availability of witnesses and documents; therefore, 7 cases (18%) that went to investigations took more than 90 days to be concluded and closed (compared to 41% in 2023). This reflects that the timeline to close cases and conclude investigations greatly improved in 2023, compared to the data from 2022.

Table 10: Overview of the processing time for handling investigated complaints in 2023  
Source: Sensitive Complaints Tracker and Overview, 2023

Processing time for case closure	Number of complaints investigated
30 days or less	13
30 to 60 days	8
60 to 90 days	10
More than 90 days	7
<b>Grand Total</b>	<b>38</b>

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 2023

Besides the 108 complaints received by HQ in 2023, a total of 6,446 operational complaints were received globally as reported by COs in their Annual Country Programme Reports 2023. This is still an increase in the number of complaints received globally as compared to the numbers reported in 2022 (5,806), 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 and 2023 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. Due to the nature of the questions in the Annual Country Programme Report 2022 and 2023, and in order to overcome the challenge of the limited data on the categorisation of complaints received by COs, DCA HQ rolled-out in 2023 a quarterly complaints reporting template where COs were requested to report the number of complaints received per quarter by category as well as by the channels through which complaints were received for a better monitoring and evaluation of the accessibility and usage of these channels. This ensured more accurate reporting and offered DCA HQ and COs the opportunity for additional analysis and trends.

The quarterly complaints reporting template included a guidance for COs on how to categorise the complaints received, with several examples given under each category. Consequently, COs categorised the 6,446 complaints received in 2023 (per quarter) into 4 different categories. The findings are illustrated in Table 11, reflecting that the majority of operational complaints received in DCA COs fell under category 2 ‘request for support or assistance’ (81%), followed by category 3 ‘minor operational complaint’ (12%), which includes complaints about the quantity or quality of DCA services, complaints about not being included in beneficiary lists, complaints about delays in recruitment process, complaints about identification cards for cash beneficiaries which were either lost or destroyed, long distance from distribution sites, and long waiting time at distribution point. COs are not asked to track sensitive complaints as these are usually received directly in HQ, or referred directly by the CO to HQ when they receive them.

Table 11: Overview of complaints received in Country Offices in 2023

Source: Annual Country Programme Reports 2023, and Quarterly Complaints Reporting Template, 2023

Categories of complaints received in COs	Number of complaints	Percentage out of all complaints
Category 1 'request for information'	471	7%
Category 2 'request for support/assistance'	5185	81%
Category 3 'minor operational complaint' (i.e. minor complaint about DCA's projects and activities)	781	12%
Category 4 'major operational complaint' (i.e. major complaint about a sensitive protection issue such as beneficiaries safety and security, GBV, etc, not perpetrated by a DCA staff)	9	0.1%
<b>Grand Total</b>	<b>6446</b>	<b>100%</b>

DCA COs tracked the channels through which complaints were received in 2023 to give insights about the most commonly used channels and to monitor and evaluate the usage and accessibility of the channels in place. Table 12 reflects that the most commonly used channel

to receive complaints across all DCA COs is the DCA hotline pertaining to COs (40.5%: calls, SMS or Whatsapp), followed by direct communication with DCA staff (36%: for example, during monitoring & evaluation field visit, while filling a survey/assessment, etc.). This reflects that the DCA hotline numbers are visible and accessible to community members, however, a good percentage of complainants or persons submitting feedback prefer to do it in-person and directly to a DCA staff. There is a slight difference in the total number of complaints categorised under the channels (6441) compared to the total number of complaints received in total (6446) since this section was new to COs and some of them were not tracking the channels from the beginning of the year but entered the data retrospectively instead, leading to missing the categorisation of 5 complaints in total as the channel through which these were received was not recalled by the relevant staff.

Table 12: Overview of the channels through which complaints were received in Country Offices in 2023

Source: Quarterly Complaints Reporting Template, 2023

The channels through which complaints were received in COs	Number of complaints	Percentage out of all complaints
The DCA hotline (call, SMS, Whatsapp)*	2588	40.5%
The CO's complaints email address	14	0.2%
DCA complaints boxes	1112	17%
Office walk-ins (complaints office or DCA office)	401	6%
Direct communication with DCA staff (i.e. monitoring & evaluation field visit, while filling a survey/assessment, etc.)	2307	36%
Referred by another organisation	0	0%
Referred by a DCA employee	19	0.3%
<b>Grand Total</b>	<b>6441</b>	<b>100%</b>

\*Some DCA COs included the complaints received through social media under the hotline channel. Very few complaints were received through social media, yet this will be considered a separate channel in the complaint quarterly reporting template in 2024.

## Partner's Complaint Systems and Complaints Received

119 of 198 partners had complaints systems in place in 2023, equivalent to 60% of all DCA's partners.

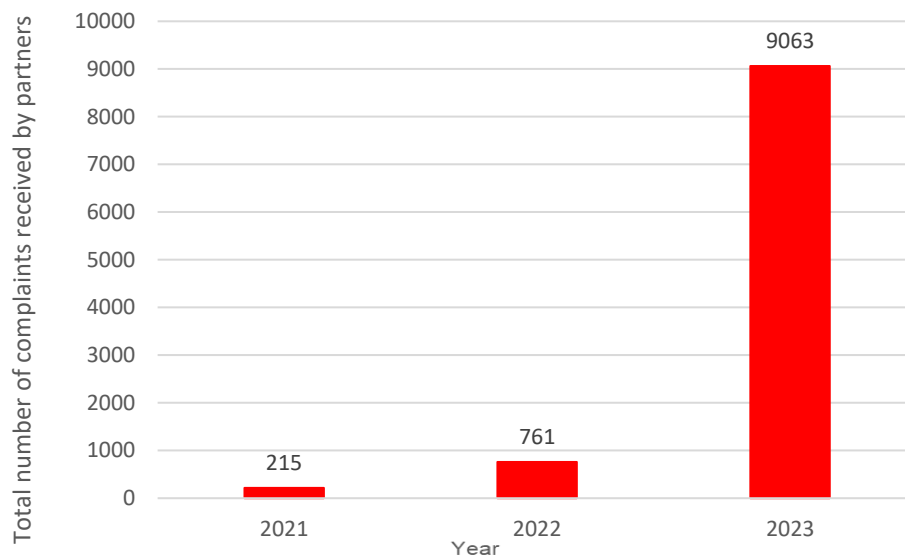
126 out of 204 partners had complaints systems in place in 2022, or 62% of all DCA's partners. The number of partners having effective complaints systems in place is comparable to the numbers reported in 2022 and 2021 (60%), considering that some partners phased out and others started working with DCA in 2023. DCA is continuously supporting old and new partners to ensure they have effective complaints systems in place and DCA COs are supporting partners without complaint systems in setting them up.

Data from the Annual Country Programme Report 2023 reflect that the 119 partners received 9,063 complaints in total in 2023. This is a significant increase from the data of 2022, where 126 partners received 761 complaints. DCA started measuring the number of complaints partner organisations received in 2021 as 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 sharing plan in this regard, where needed. The significant increase in the number of complaints received by partners in 2023 (as shown in Figure 9) reflects the results of the trainings and capacity sharing delivered by DCA to the partners on complaints handling, where DCA COs further 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, especially after the roll-out of the quarterly complaints reporting template in 2023. When the latter was rolled-out and DCA COs started following-up with partners more frequently (quarterly), some partners were struggling to report the numbers received since they were not tracking them regularly. Accordingly, DCA COs further supported them by sharing additional templates and by delivering additional trainings explaining the importance of regular tracking upon the receipt of any feedback and complaint to ensure proper response and closure of the feedback loop. Consequently, when partners were capacitated on the categories of complaints, they started recording additional data compared to the data they used to report on a yearly basis without any categorisation. This is also an area of improvement from DCA COs' side, whereby a great focus was made in 2023 by HQ on the importance of following up more systematically with partners on their complaints systems and the numbers received, especially that in 2022 and 2021, several COs reported that a high number of their partners have a complaints system in place, yet a very low number of complaints were received throughout the year, which reflects some weaknesses or gaps in the partners' complaints systems.

Figure 9: Overview of complaints received by partners per year

Source: Annual Country Programme Reports 2021-2023, and Quarterly Complaints Reporting Template, 2023



Partners were requested to categorise the complaints received in 2023 (per quarter) into 5 different categories. The findings are illustrated in Table 13, where the total number of complaints categorised is less than 9,063, whereby few partners in three of DCA COs did not submit the categories of complaints received as this was the first year they start using or reporting on this data and they needed more time to be trained or capacitated. This was identified as a weakness for specific partners and DCA COs will support them to ensure that all complaints are properly tracked and categorised in 2024. The numbers in Table 13 reflect that the majority of operational complaints received among partners fell under category 1 'request for information' (45%), followed by category 2 'request for support or assistance' (38%). The numbers of minor operational complaints received (category 3) and the number of sensitive complaints received are low compared to the numbers reported under the first two categories. This reflects that partners need to further raise the awareness of community members on the purpose of the complaints systems and encourage them to submit complaints about the activities if any or about the behaviour of the partner staff, as the low number received gives an indication that the latter is under-reported.

Table 13: Overview of complaints received by Partners in 2023  
Source: Quarterly Complaints Reporting Template, 2023

Categories of complaints received among partners	Number of complaints	Percentage out of all complaints
Category 1 'request for information'	2763	45%
Category 2 'request for support/assistance'	2379	38%
Category 3 'minor operational complaint' (i.e. minor complaint about the partner projects and activities)	829	13%
Category 4 'major operational complaint' (i.e. major complaint about a sensitive protection issue such as beneficiaries safety and security, GBV, etc, not perpetrated by a partner staff)	238	4%
Category 5 'Complaint about violation of the CoC and policies' (i.e. incidents of Sexual Exploitation and Abuse, fraud and corruption, etc.)	10	0.1%
<b>Grand Total</b>	<b>6219</b>	<b>100%</b>

Similar to DCA COs, partners were requested to track the channels through which complaints were received in 2023 to give insights about the most commonly used channels and to monitor and evaluate the usage and accessibility of the channels in place. The findings are illustrated in Table 14, where the total number of complaints received through the different channels was also lower than the total numbers of complaints received by partners in total, whereby few partners in four of DCA COs did not submit the channels through which the complaints were received as this was the first year they start using or reporting on this data and they needed more time to be trained or capacitated. DCA COs flagged this challenge, and they will support these specific partners further during 2024 to ensure a better and a complete reporting. Table 14 reflects that the most used channel to receive complaints among DCA partners are the hotlines pertaining to partners (39%: calls, SMS or Whatsapp), followed by office walk-ins (30%, for example complaints office or partner office). Similar to the findings from DCA COs, the hotline was the most commonly used channel for partners and the percentage recorded under this channel was very comparable to the one reported by DCA COs (40.5% for DCA COs and 39% for partners). This shows that the partners' hotline numbers are visible and accessible to community members, however, a good percentage of complainants or persons submitting feedback prefer to do it in-person through office walk-in.

Table 14: Overview of the channels through which complaints were received by partners in 2023

Source: Quarterly Complaints Reporting Template, 2023

The channels through which complaints were received among partners	Number of complaints	Percentage out of all complaints
The partner's hotline (call, SMS, Whatsapp)*	2428	39%
The partner's complaints email address	85	1%
The partner's complaints boxes	439	7%
Office walk-ins (complaints office or partner office)	1835	30%
Direct communication with a partner staff (i.e. monitoring & evaluation field visit, while filling a survey/assessment, etc.)	1268	21%
Referred by another organisation	124	2%
Referred by a partner employee	7	0.1%
<b>Grand Total</b>	<b>6186</b>	<b>100%</b>



*\*Some DCA partners included the complaints received through social media under the hotline channel. Very few complaints were received through social media, yet this will be considered a separate channel in the complaint quarterly reporting template in 2024.*

## Summary of challenges and improvements among DCA COs and partners

During the CHS audit in 2023, the auditors added under one of the observations that the annual reporting process and the quarterly complaints reporting template allow for a quantitative monitoring of the existence of partner complaint handling mechanisms, but do not provide a qualitative analysis of their appropriateness and timeliness or the challenges and improvements among partners. Consequently, two additional qualitative questions were added to the Annual Country Programme Report 2023, where COs were asked to describe the main improvements or main challenges faced with regards to their local complaints system or partners' complaints systems during the reporting period. Examples are illustrated in Table 15.

Table 15: Overview of challenges and improvements related to the handling of local complaints systems among Country Offices in 2023

Source: Annual Country Programme Reports 2023

Challenges among DCA COs and partners with regards to their local complaints systems	Improvements among DCA COs and partners with regards to their local complaints systems
Linguistic barriers due to cultural and linguistic differences between community members and staff handling the complaints systems, which hindered the understanding of complaints and the resolution process particularly the complaints channelled through the toll-free line	During 2023, the complaints system became more accessible through simplifying the process for submitting complaints, ensuring that information is available in multiple languages, and providing assistance to individuals who may face barriers in accessing the system, such as those with disabilities or with limited literacy.
Limited understanding of the complaint handling procedure for the focal points among some partners due to changes of focal points and staff turnover without notification to DCA.	Conducted awareness sessions and campaigns to inform the community about the existence and purpose of the complaints system through community meetings and populating the related visibility materials.
DCA has a limited ability to verify whether partners address sensitive complaints received according to complaints handling and investigation guidelines given the confidentiality aspect of such complaints.	The main improvement was the quarterly follow up with partners on complaints received during each quarter based on DCA's new requirement. This ensured a robust documentation and record-keeping systems leading to more accurate recording of relevant information related to complaints.
Lack of resources (financial and human resources) to manage complaints among partners. Similarly, insufficient resources to manage complaints among DCA COs due to high workloads, coupled with staff turnover, which made monitoring and follow-up on complaints challenging.	A dedicated email address for complaints has been established, alongside the introduction of a hotline for quicker and more direct communication. Complaint cards, containing the hotline number and email address, have been created and distributed at distribution sites to reach community members, beneficiaries, and community leaders.
During the monitoring visits with partners, it became evident that while partners had established feedback and complaint channels, there was ambiguity regarding the processes and efficiency of these channels.	Most of the partners assigned a focal point to handle the complaints received. This in turn improved the follow-up mechanisms with partners to ensure the appropriateness and effectiveness of their complaints systems.
The cultural norms play a role whereby community members do not want to make others feel bad by submitting complaints combined with the fear of being disqualified from the assistance	Provided additional trainings for partner staff to enhance their skills in handling sensitive complaints and communicating effectively with community members. Furthermore, DCA helped

following the complaint, which can lead to low numbers of complaints submitted.	partners to establish new reporting channels, such as a dedicated hotline, online portal, or mobile application, to provide community members with diverse and accessible means to submit their complaints.
Receiving many requests for assistance in a short span of time, making it difficult for the relevant teams to follow up on all of them and record/respond within the set timeframes.	Conducted community consultations, mobilization and engagement to map existing complaints and feedback mechanisms, assess preferred feedback modalities and adjust available systems accordingly.

## 5. Focus Areas from 2023

In 2023, DCA strengthened its Accountability and Complaints system at both Head Quarter (HQ) and Country Office (CO) level. The 2022 Complaints Report pointed at some activities to be implemented in 2023. Below is a brief update on each activity.

### Staff and Partner Capacity Strengthening

#### a. Training on the DCA CoC and expected staff behaviour

In order to simplify the CoC commitments and ensure that DCA staff practice them in their everyday work life, DCA's Accountability and Complaints Advisor developed in August 2023 a training presentation on the CoC focusing on practical examples of breaches to simplify the expected staff behaviour and ensure that staff understand the CoC and its breaches. The training was piloted in Lebanon in August 2023, in Ukraine in September 2023, in Syria in December 2023 and there are plans to have this presentation available on DCA website in 2024 for Focal Points in COs to use it to train their colleagues. During this training, staff are asked to convey these messages to community members, so they understand what a misconduct is and when they need to complain. The same presentation can be used to train DCA partners on the CoC and expected staff behaviour, since it is crucial to ensure that information about partner staff behaviour is also communicated to communities where DCA projects are implemented by partners. This was also piloted in Lebanon where a training was delivered to all partners in August 2023, and it will be piloted in 2024 in Uganda and Cambodia.

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

During the first half of 2023, DCA's Accountability and Complaints Advisor organised one-on-one meetings with COs to ensure that all DCA COs have functioning complaints systems in place after developing a compliance checklist aiming at assessing COs' compliance with DCA's complaints handling guidelines, assessing their practices and identifying gaps and support needs. Consequently, based on the identified needs, DCA's Accountability and Complaints Advisor delivered tailored trainings to DCA staff and partner staff to provide employees with a solid understanding of the policies that frame the complaints system and DCA's complaints handling guidelines. An in-person training was delivered in Lebanon in August 2023 to shed light on the revised Code of Conduct, what types of complaints can be submitted, how complaints are handled in DCA as well as a training to representatives from all DCA partners in Lebanon about the CoC, the minimum standard guidelines for a complaint system as well as the importance of recording, tracking and responding to complaints. The same training on the DCA CoC with real life examples on the breaches of the commitments was also delivered by HR to all DCA staff during their visit to Ukraine

during September 2023. The DCA's Accountability and Complaints Advisor delivered additional remote trainings to members of the complaints committee in Ukraine, with a focus on PSEAH. The latter was also a focus of a remote training to all staff in DR Congo delivered during October 2023. During December 2023, the DCA Accountability and Complaints Advisor delivered the CoC training to specific DCA staff in Syria based on request.

**c. DCA's Accountability and Complaints Focal Point Webinars**

The Accountability and Complaints 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 are discussed, and experiences are shared between the focal points. The quarterly webinars continued to be organised and delivered throughout 2023. Based on the feedback from the Accountability and Complaints Focal Points, the webinars have been very informative and successful and hence they will continue in 2024.

**d. Guidance on information sharing and DCA standard posters about the DCA CoC and expected staff behaviour**

In order to address a Corrective Action Request (CAR) from the CHS audit 2021, DCA's Accountability and Complaints Advisor developed and rolled out a Guidance on Information Sharing about DCA CoC and expected staff behaviour, detailing the process COs are expected to follow during 2023 to ensure that information about the complaints system, DCA's CoC and expected staff behaviour are easily visible, accessible and frequently communicated to community members. This was coupled with the development and roll-out of standard posters or visibility material on topics such as PSEAH, DCA Complaints Systems and the Whistleblower Scheme, Anti-corruption, and expected staff behaviour. The posters were made available by HQ in the three main languages (English, Arabic and French), and were shared with COs to harmonise information dissemination. They were included as a main point in the Guidance on Information Sharing about DCA CoC and expected staff behaviour, whereby all DCA COs and field offices were requested to prioritise and boost their information dissemination through sharing with communities the communication and visibility material, that are simple with infographics and images to ensure they are accessible and culturally acceptable for a range of contexts. The guidance was shared with DCA Country Directors to ensure their commitment to prioritising information dissemination and the printing of posters, and COs were encouraged to translate them to local languages when resources allow.

**e. Quarterly complaints reporting template**

During the first quarter of 2023, DCA's Accountability and Complaints Advisor developed and rolled out the quarterly complaints reporting template to COs to improve the reporting of the number of complaints received with their categories and the channel through which these were received. This template was shared with COs during the first webinar in March 2023 after explaining its content in detail. COs were requested to share this template with partners coupled with continuous follow-up to ensure that partners are filling it on a quarterly basis and to support partners with the challenges they were facing hindering them from reporting the data using this template. DCA's Accountability and Complaints Advisor followed-up continuously with all Complaints Focal Points who were in charge of updating this template on a quarterly basis, to ensure accurate and complete reporting.

**f. Training to DCA staff on investigating fraud and safeguarding complaints**

Since DCA has experienced an increase in the number of received complaints (during 2022 and 2023), and the number is expected to increase with proper information



sharing and awareness raising around the DCA complaints system and the Whistleblower Scheme, DCA HQ acknowledges the need to train more internal staff in COs and in HQ on investigation. This was also flagged as a main need by the majority of COs during their one-on-one meetings with the DCA Accountability and Complaints Advisor. Accordingly, after launching a call for proposal, DCA signed a framework agreement for 3 years with a contractor in September 2023, to deliver the Training on Investigating Fraud and Safeguarding Complaints. Consequently, the first 5-days in-person training was held in Nairobi in November 2023 which was attended by 23 DCA staff from HQ and different COs, with very positive feedback received. Another training will be held in 2024 whereby several DCA staff from COs have expressed interest in the training and DCA acknowledges the importance of training more than one staff in each CO on the investigation techniques, in order to ensure that complaints are investigated according to the DCA procedures when referred to the COs and to reduce the workload of the Complaint Focal Point, who is usually tasked to support in investigations. DCA recognises that while training is important and relevant, drawing on staff resources for investigation can be a challenge for COs as it draws investigators away from their “normal” tasks. However, the DCA Accountability and Complaints Advisor supports trained investigators in COs to ensure they spend less time on carrying out investigations.

## **Development and Updates of Policies and Procedures**

### **g. Revision and roll-out of DCA’s CoC and related policies (Anti-Corruption, Child Safeguarding, PSEAH)**

Every few years, DCA is committed to updating its CoC and related policies based on recommendations from donors or other requirements (i.e. audits) to align with international standards. Therefore, the DCA CoC and related policies (Anti-Corruption Policy, Child Safeguarding Policy and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy) were revised and approved by DCA’s senior management in quarter 2, 2023. Accordingly, the policies were translated and made available in all three main languages (English, Arabic and French) and they were officially launched to all staff in a house meeting in September 2023. Consequently, the revised CoC and policies were uploaded to DCA’s Programme and Project Manual and website. This was shared with all staff on DCA’s Intra and DCA’s Accountability and Complaints Advisor presented the CoC and policies during the webinar with Accountability and Complaints Focal Points in September 2023, who are requested to raise awareness or share this information with their colleagues in their COs.

### **h. Complaint referral procedure for complaints that do not fall within the scope of DCA’s complaints system**

During the CHS audit 2021, the auditors raised a minor CAR stating that “DCA has no formal referral mechanisms in place for complaints that do not fall within the scope of the organisation or its partners”. To address this CAR, DCA developed a Guidance on Referral Mechanism that builds upon the Inter-Agency Standing Committee (IASC) Community-Based Complaint Referral system. The guidance seeks to strengthen compliance within a survivor-centred approach and to apply good global practices on PSEA. The referral mechanism covers sensitive complaints as well as non-SEA/sensitive complaints. The Guidance on Referral Mechanisms was further developed in 2023 and was complemented by a new referral form for SEAH complaints that was shared with Complaints Focal Points, requesting from them to follow this guidance when receiving and referring cases that do not fall within the scope of the DCA complaints system. As a result, this minor CAR was closed and addressed during the CHS audit 2023.

**i. Survivor-centered approach and mapping of services**

During 2023, DCA recognized the importance of ensuring that a survivor-centered approach is embedded throughout the complaints system. Accordingly, DCA's Accountability and Complaints Advisor shared this information with Country Directors and Accountability and Complaints Focal Points, with a request to develop an updated list of local Non-Governmental Organisations (NGOs), Community-Based Organisations and operating entities in the areas where DCA is working. This will ensure that DCA can follow a clear referral pathway for cases that need professional and urgent care as part of its investigations, in a timely and responsive manner to the relevant organisation. A mapping of services template was developed and shared with the Focal Points where they can add the actor per service in each of DCA's areas of work. This was not fully implemented across all COs in 2023, hence this will be followed-up on in 2024 to harmonise the process across all COs.

**j. Finalise and communicate Complaints and Whistleblower Systems and policy**

During quarter 3, 2023, DCA established its Internal Audit unit, which serves as an independent and objective assurance function, striving to enhance DCA's operations, risk management, internal controls, and governance. DCA's internal audit unit is independent from any department in DCA and reporting directly to the DCA Board. The Whistleblower Scheme is embedded under the DCA's internal audit unit and will be fully functional in 2024. During 2023, DCA's Accountability and Complaints Advisor, the head of the SQM and the head of the internal audit unit set-up a taskforce to revise and update the Whistleblower Scheme policy and Standard Operating Procedure (SoP), detailing the scope of the scheme as well as its coverage. 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. During 2023, DCA's Accountability and Complaints Advisor was following up regularly with PwC to finalise the platform and reporting forms with a focus on improving the level of analysis compared to the current DCA's online complaints tracking system (Zendesk) to facilitate dashboards or analysis. The updated reporting forms will be accessible at DCA's website and launched in 2024. Once the revised Whistleblower policy is approved by senior management, the guidelines for the clear separation between the DCA's complaints systems and the Whistleblower scheme will be rolled out to all DCA staff.

**k. Update DCA's guidelines and SoPs for complaints handling**

This activity to update the DCA's guidelines and SoPs for complaints handling was planned for 2023 as the current versions are from 2018. Given the other priorities and that the currently available guidelines are comprehensive and still valid, this activity was postponed until 2024, especially after the launching of the CHS Alliance Managing Complaints Guide in November 2023, in order to ensure the alignment of DCA guidelines with the latter. The updated DCA guidelines will be finalised during 2024 and 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.

**l. Develop and implement action plan based on findings from the CHS mid-term audit 2023**

The CHS mid-term audit 2023 report highlighted some recommendations called CARs and Observations (OBS) that DCA will work to improve. DCA's accountability and complaints advisor and compliance coordinator added these recommendations in the DCA Recommendation and Requirement Overview (in internal living document) to track progress against their work plan, and the latter was shared with relevant staff in HQ in order to fill how they plan to address the OBS and CARs. This ensured a strong

organisational focus and ownership in implementing the actions within the organisation. All the OBS and CARs which were included in the DCA Recommendation and Requirement Overview were extracted and linked to another document called CHS recommendation overview. This overview was shared with Country Directors and Accountability Focal Points in COs, requesting from them to focus on the action plan for the two CARs from the CHS mid-term audit and to reflect these in their Accountability Improvement Plans (AIPs).

## **Responding to Changes in Donor Compliance Requests**

### **m. 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 2022 where DCA needed to expand the analysis related to DCA's complaints system and include qualitative analysis. Accordingly, in 2023, DCA revised the complaints section in the Annual Country Programme Report to be filled by COs by adding two additional qualitative questions, where COs were asked to describe the main improvements or main challenges faced with regards to their local complaints system or partners' complaints systems during the reporting period. The data from these questions was used in the current report.

### **n. INGOs report Sexual Abuse and Harassment (SEA) cases to ECHO**

ECHO established a requirement for all international NGOs to report SEA cases. DCA followed this requirement in 2023 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 2023 report will be submitted to ECHO in April 2024.

## **Network and Learning**

### **o. Improve e-learning platform**

Between September and December 2023, the Accountability and Complaints Advisor updated the content of the onboarding courses on DCA's e-learning platform (FABO) to reflect the changes made in the CoC and policies. The CoC and Anti-Corruption courses were finalised by DCA's Learning Lab during 2023 and there are plans to have them available in French and Arabic as well during 2024 to mitigate the language barrier. DCA's Accountability and Complaints Advisor worked on the script of a new PSEAH course during 2023; it will be available on DCA's e-learning platform in 2024 and the aim is to have it as a yearly refresher training for all staff to remind them about DCA's PSEAH policy and that DCA has zero tolerance to SEAH as well as how they are expected to behave and comply with this policy. During 2023, the mandatory CHS course was also revised by developing a shorter version that can be easily understood by all staff and the longer version will be used as an advanced course. The DCA Complaints Welcome course will be updated during 2024 after the finalisation of the DCA's Whistleblower Scheme to reflect the updates in the course.

### **p. 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 2023, four meetings or webinars were held (two face to face and two online) and the DCA's Accountability and Complaints Advisor represented DCA during

these meetings. As the reporting of demands for facilitation payment was listed as a challenge among all FAFPI members, DCA's Accountability and Complaints Advisor met with the DCA head of safety and security during July 2023 to agree on a procedure to ensure that facilitation payment cases are systematically reported and tracked in DCA, in order to limit the under-reporting or duplication of reports (complaints systems versus security incident reports).

## **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 updates its Anti-corruption policy by expanding it to cover the issue of tipping-off and explaining staff responsibilities for matters relating to knowledge/suspicion of fraud and related investigations. This recommendation was addressed in 2023 with the rollout of the revised Anti-Corruption policy.

### **CHS Mid-Term Audit**

The CHS Mid-Term Audit was carried out between March and May 2023. The focus was CO level in four different countries: Kenya (in-person visit), Bangladesh, Mali and Uganda (remotely). The auditors conducted interviews with a select number of HQ and CO staff, as well as interviews and focus group discussions with community members and partners in Kenya 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 information sharing on the CoC and expected staff behaviour where DCA does not systematically ensure that information on the expected behaviour of DCA and partner staff is effectively communicated to communities. Similarly, the second CAR states that DCA does not consistently ensure and monitor that communities and people affected by crisis are fully aware of the expected behaviour of DCA and partner staff, and their commitment to PSEAH.

To address these two CARs, DCA rolled out in 2023 the information sharing guidelines on the DCA CoC and expected staff behaviour and developed the standard posters (section 5, points a, b and d). Finally, there are additional plans to address these two CARs in 2024 which are explained in the relevant section of this report (section 8).

Findings from the CHS Mid-Term Audit report reflect that the two CARs that emerged in the recertification audit in 2021 were closed in 2023 and were turned into observations to ensure follow-up. The first CAR that was closed was related to complaint handling systems and that DCA does not systematically ensure that its partners have functioning complaint handling systems in place. The second CAR that was closed was that DCA had no formal referral mechanisms in place for complaints that did not fall within the scope of the organisation or its partners.

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 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. In March 2024, an updated version of the CHS will be brought into practice, building on an extensive global consultation process and informed by learning gathered from CHS users and humanitarian and development stakeholders from around the world. DCA's Accountability and Complaints Advisor and Compliance Coordinator participated in the CHS revision consultation workshop in Geneva in June 2023. Furthermore, DCA's Accountability and Complaints Advisor attended different webinars held by the CHS Alliance protection against sexual exploitation and harassment Community of Practice (CoP) and the Accountability to affected people CoP.

### **Fight Against Facilitation Payment Initiative**

Throughout 2023, 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 2023. 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.

### **ACT Alliance Safeguarding Community of Practice**

In 2023, DCA's Accountability and Complaints Advisor joined the ACT Alliance Safeguarding CoP and attended the quarterly webinars held by the CoP. This is a great opportunity for DCA to connect globally with other organisations to discuss further on safeguarding, its implementation, experience sharing and how to add good practices in the current context, with a special focus on PSEAH. The experiences and challenges faced by multiple organisations is inspiring and DCA can build upon the shared the lessons learned.

### **Core Humanitarian Standards (CHS) Focal Point Network (DK)**

In 2023, DCA's Accountability and Complaints Advisor coordinated with colleagues from different Danish organisations funded by the Danish MFA and agreed to form a network for the CHS Focal Points in these organisations to exchange experiences on the CHS requirements and the donors' due diligence. In 2023, DCA's Accountability and Complaints Advisor attended the meetings organised by the network/working group, which offered a valuable exchange opportunity for its members. Five organisations joined the network and there are plans to expand it further to other Danish NGOs in 2024.

## 8. Planned Focus Areas for 2024

Below activities are planned to be implemented in 2024. Follow-up on each of the focus areas, will be reported in next year's report.



- a. Finalise and communicate Complaints- and Whistleblower policy (two separate policies).
- b. Update the DCA complaints handling guidelines and SOPs for handling complaints after the official launch of the Whistleblower Scheme policy and SoP.
- c. Launch the updated platform for the DCA Complaints System and the Whistleblower Scheme. The information about the difference between the two will be available on the website allowing intended users to make informed decision where to submit their complaint. This will be accompanied by the official launching of the DCA standard posters or visibility material on the reporting channels (locally and globally). These posters will include QR codes to facilitate the access of community members to the online reporting forms for sensitive complaints. During 2024, all COs will be requested to install the standard posters in the DCA offices and their areas of implementation (safe spaces, community centres, etc.).
- d. Update the DCA Quality and Accountability Framework currently available on DCA's website as it is outdated.
- e. Improve the monitoring of partners' practices with regards to handling and addressing complaints. DCA previously developed a Minimum Standard Guideline for Partners Complaint Systems that COs use in their spot-checks. This Guideline will be updated in 2024 as per the CHS recommendation overview, to reflect the importance of the timely closure of the loop, and the importance of community consultations (first step in setting up or revising a complaints system), among others. This will be rolled out again to COs to make sure they use it more systematically.
- f. Update the accountability and complaints section in the DCA Partnership Assessment Tool (PAT). The CHS audit 2023 noted an observation that the current version of the PAT lacks a clear definition of what constitutes a "well-functioning" Complaint Mechanism. During 2024, DCA will update this section in the PAT and add the criteria that should be in place to guide staff filling the PAT in rating the partner's complaints system as they find this area challenging.
- g. The DCA Complaints Advisor will monitor the implementation of the information sharing guideline on the CoC and expected staff behaviour among COs during 2024 to ensure that communities and people affected by crisis receive, and fully understand, this information. All DCA COs were asked to incorporate this recommendation in their AIPs for 2024 to commit to following up on it and ensure they will prioritise information sharing with community members.
- h. The DCA Complaints Advisor will work with COs to improve the monitoring of the complaints system and what information is disseminated to community members. DCA COs embed questions in their monitoring and evaluation tools on the complaints system, communities' awareness about its availability, their satisfaction with it or their preferred means to use the system. During 2024, DCA Accountability and Complaints Advisor will share additional questions with COs and will recommend to COs to add these, asking community members whether they were informed by DCA staff about its expected staff behaviour, its code of conduct and the scope of its complaint system. The DCA monitoring and evaluation staff will analyse this information and take the corrective actions as needed to improve the information sharing with communities in this regard. The questions will be shared again with Accountability and Complaints Focal Points during the first webinar in 2024 to ensure implementation and follow-up.
- i. Continue the update of the DCA onboarding courses (update the CHS course upon the launching of the updated CHS in March 2024, update the complaints welcome course to reflect the changes in the Complaints System and Whistleblower scheme) and start working on making courses available in different languages to overcome the language barrier among some staff. Pilot the updated courses on DCA's e-learning platform (FABO) including establishing a system that can keep track of employees who have undergone the training.
- j. Build the capacity of Focal Points and other staff in COs on investigation through

planning another investigation training with the aim of having it remotely to give an opportunity of staff who cannot travel to join the training.

- k.** Participate in the International Anti-Corruption Conference in June 2024, which is an opportunity for networking and learning.
- l.** Deliver the planned in-person trainings on Accountability and Complaints for DCA and partner staff in Central African Republic, DR Congo, Mali, and Cambodia as well as online trainings planned for DCA and partner staff in Uganda and South Sudan.
- m.** Update the Cooperation Agreement with Partners to align with the MFA clauses on PSEAH and child labour and to elaborate on the situation where DCA can investigate complaints on behalf of partners.
- n.** DCA is audited each year by external CHS auditors; its last four-year CHS certificate was renewed in 2021 and remains valid until January 2025. The DCA Complaints Advisor and the DCA Compliance Coordinator will plan and lead the renewal of DCA's CHS Certification. The renewal audit will be carried out between June and September 2024, with the aim of having a final report and a renewed CHS certificate by the end of December 2024.