



# **Complaints Report 2017**

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## 1. About the report

It is central to accountability, impact and learning to have a system in place to receive and respond to complaints. Such a system is a formal way of recognising and addressing the power imbalance between us and the communities we work with and a way to address potential human rights abuse as well as any actual or potential adverse human rights impacts. This 2017 Complaints Report from DanChurchAid (DCA) is an expression of our commitment to transparency and accountability. In this annual report, we publicise an overview of the complaints we have received in our complaints system throughout the year.

DCA categorises the complaints we receive into two types: sensitive and non-sensitive complaints. **Non-sensitive complaints** are complaints about **shortcomings** in the performance of activities and processes of DCA, for example if partners, rights-holders or donors believe DCA has not lived up to its operational standards (and the issue addressed is not classified as a sensitive complaint).

**Sensitive complaints** are complaints about (suspected) breaches of national or international law, the DCA staff code of conduct, and the policies referenced in it or issues relating to international human rights law. Sensitive complaints have two overall sub-categories: cases related to corruption (corruption-cases), and cases related to other sensitive issues such as staff misconduct (other sensitive cases).

Cases related to alleged corruption are published on our website as they are received throughout the year. They are then collected in this report year by year. We are committed to this high degree of transparency because we believe that one of the key ways to fight corruption is transparency. Moreover, we hope through this report to give the reader an understanding of the great lengths to which we go to handle each case with diligence and of our constant effort to ensure that every donated kroner is used for its intended purpose.

As the character of the cases most often is sensitive, it is very important to safeguard the people involved and the evidence collected. Thus we decide on a case-by-case basis the what extent to which we need to anonymise the information made public. For the same reason, we never publicise names of individuals who bring forward complaints or are implicated in a specific complaint.

Each year, a member of the DCA board acting as a designated focal point relating to the complaints mechanism selects a number of sensitive cases and conducts a quality assurance of the process and decisions made during the complaints handling process.

## 2. Executive summary and highlights

This year's report gives insight into the special efforts made to address the shortcomings identified by the external auditors who conducted the audit against the Core Humanitarian Standard. This includes: 1. Increased resource allocation to complaints handling and the development of our complaints handling mechanisms; 2. Roll-out of an interactive online training course for all staff; 3. The initiation of a global network of focal point persons engaged in maintaining and improving complaints procedures in our country offices.

A total number of 62 complaints were received in 2017 at Head Office in Copenhagen. Of these, 43 were non-sensitive complaints received and resolved at our Head Office. There were 19 sensitive complaints received globally and resolved at Head Office; 12 of these complaints related to corruption or alleged corruption and seven related to other sensitive matters such as staff conduct.

The total number of non-sensitive complaints at Head Office is on par with the average seen over the past seven years, and you can see a breakdown of the key subjects of these complaints in the section on non-sensitive complaints below.

Some of the sensitive cases dealt with in 2017 required the use of considerable resources and time and were more complex than previously experienced. This underlined the relevance of increasing the resources set aside to handle sensitive complaints and also of the process aimed at strengthening and streamlining the procedures for handling them.

As a new feature of the report, we present the number of non-sensitive complaints received and resolved in our country offices. We received and resolved 929 non-sensitive complaints in 2017 at our country offices. However, the methodology we use to count complaints and distinguish between complaints and mere feedback is still under development, and the figures should be read in that light.

## 3. Activity report 2017

### 3.1. Evaluation against the core humanitarian standard

In the beginning of 2017, DCA underwent its first certification against the Core Humanitarian Standard (CHS). This was not an entirely new exercise because DCA was previously certified against the former standard for quality and accountability, the Humanitarian Accountability Partnership (HAP), in 2008 and 2012. The CHS is in effect the successor to HAP. DCA considers the CHS certification to be an important recognition of the quality and accountability of our work. The CHS is a critical tool to assist us in our daily work to ensure quality, reduce the risk of mistakes, abuse and corruption, and continuously improve our work – for the benefit of both DCA and, not least, the people we work for.

CHS certification in early 2017 concluded that there were six specific areas where DCA had to improve in order to live up to the nine commitments around quality and accountability. These are referred to as “CAR” (Corrective Action Required). Four of those six CARs were related to the DCA complaints handling procedures as follows:

1. DCA does not clearly communicate or ensure that communities are informed about how relevant stakeholders can access its complaints mechanism and the scope of issues it can address.
2. DCA does not systematically ensure that complaints-handling mechanisms for communities routinely prioritise the safety of the complainant and those affected at all stages.
3. DCA does not ensure that communities are aware of expected behaviours of staff, including commitments made on prevention of sexual exploitation and abuse
4. DCA does not have in place formal referral mechanisms for complaints that do not fall within the scope of the organisation or that of its partners.

### 3.2. Corrective measures related to complaints handling

The resources dedicated to handling complaints were increased significantly in 2017, both to address the CARs listed above but also to meet the increasing number of complaints received through the complaints system.

Specifically, the following was done in 2017 related to complaints handling:

- Several online-meetings have been convened with specially appointed focal-point persons from country offices and programmes where the complaints procedures and principles have been discussed. The focal point persons will constitute a global community of practice of people engaged in improving and maintaining DCA’s complaints mechanism globally and locally.
- We have launched a mandatory online training on staff responsibilities and principles for complaints handling
- Senior management has had complaints handling as a topic during management meetings on several occasions
- The guideline for complaints handling procedures at country office level has been updated and re-launched. The guideline has been refined and elaborated to meet various demands, including new instructions related to safeguarding of personal data and referral of complaints that DCA cannot handle.
- We have formalised and reviewed our procedures for handling sensitive complaints to ensure effective use of resources while still upholding high standards and consistency in the way that we handle these complaints. At all stages there is a strong focus on the safety of the complainant, the subject of the complaint and those affected.

- A representative of the DCA board has been specifically mandated to follow DCA's work with complaints mechanisms.

### 3.3. Measures related to Anti-corruption.

In relation to anti-corruption, DCA continues to work with focal point persons at the country office level who oversee local engagement in the anti-corruption policy and efforts. Moreover, all new staff members complete the mandatory online training on anti-corruption, which is also offered to our implementing partners. DCA remains ambitious in our efforts to ensure that none of the funds we are entrusted with are lost to corruption. This includes being part of innovative approaches and initiatives to fight corruption. In 2017, DCA took an active and leading role in establishing a new multi-sector collective action initiative under the Danish Confederation of Industries: the Fight Against Facilitation Payment Initiative (FAFPI)

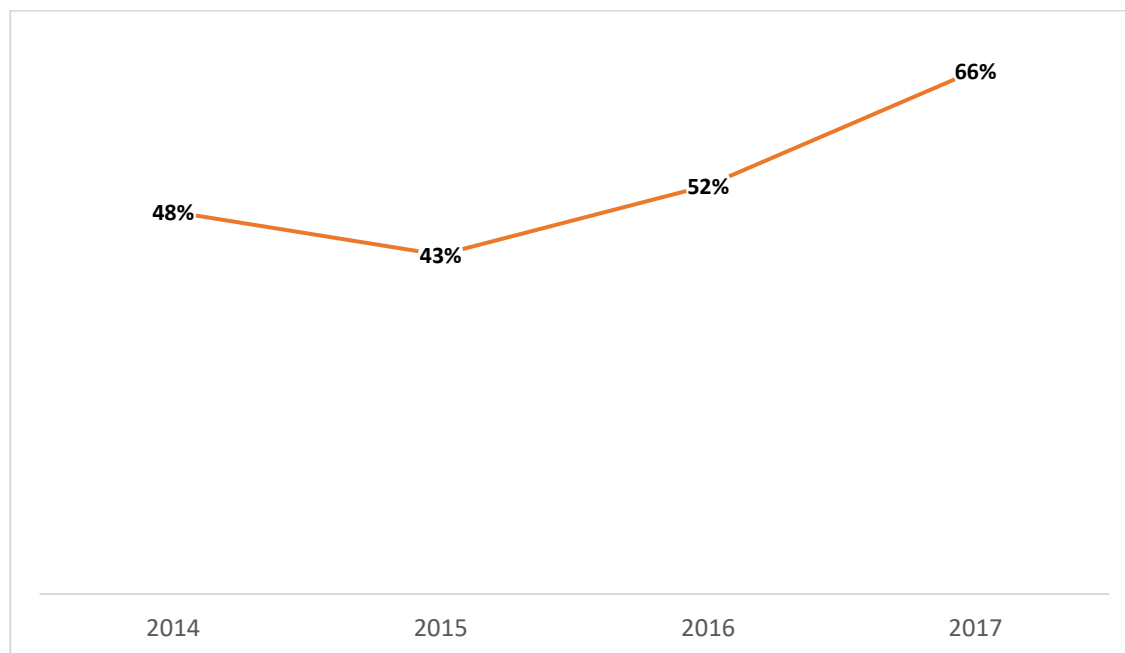
### 3.4. Working with partners

DCA does not require that the partners we work with around the world have their own complaints handling mechanism. But we strongly encourage that they do such a mechanism, and we offer our support when they work to establish suitable procedures. Where partners do not have a mechanism in place themselves, we ask that they make DCA's mechanism available to the beneficiaries and communities affected by our joint projects.

The below table gives an overview of how many partners have a complaints handling mechanism in the countries where DCA is represented:

DCA Focus Country	Number of partners in 2017	Partners with functioning complaints system 2017	2017 in %
Bangladesh	4	4	100%
Cambodia	16	5	31%
CAR	N/A		
DR Congo	N/A		
Ethiopia	11	10	91%
Lebanon	1	1	100%
Myanmar	26	17	65%
Malawi	13	10	77%
Mali	1	1	100%
Kenya	4	2	50%
Nepal	28	19	68%
Palestine	24	14	58%
South Sudan*	16	15	94%
Syria	5	5	100%
Uganda	15	13	87%
Libya	7	0	0%
Zimbabwe	24	13	54%
Total	195	129	66%

Our CHS Focal Point persons and colleagues works continuously with partners to support them in developing complaints handling mechanisms, and the below chart shows the percentage of our total partner-portfolio that has a complaints mechanism in place:



### 3.5. Planned focus-area for 2018

The focus for 2018 is to address the two CARs from our CHS Audit, which point to weaknesses in relation to our work with partners and communities. The weaknesses concern awareness of expected behaviours of staff, including commitments made on prevention of sexual exploitation and abuse, and that communities are informed about how relevant stakeholders can access the complaints mechanism and the scope of issues it can address.

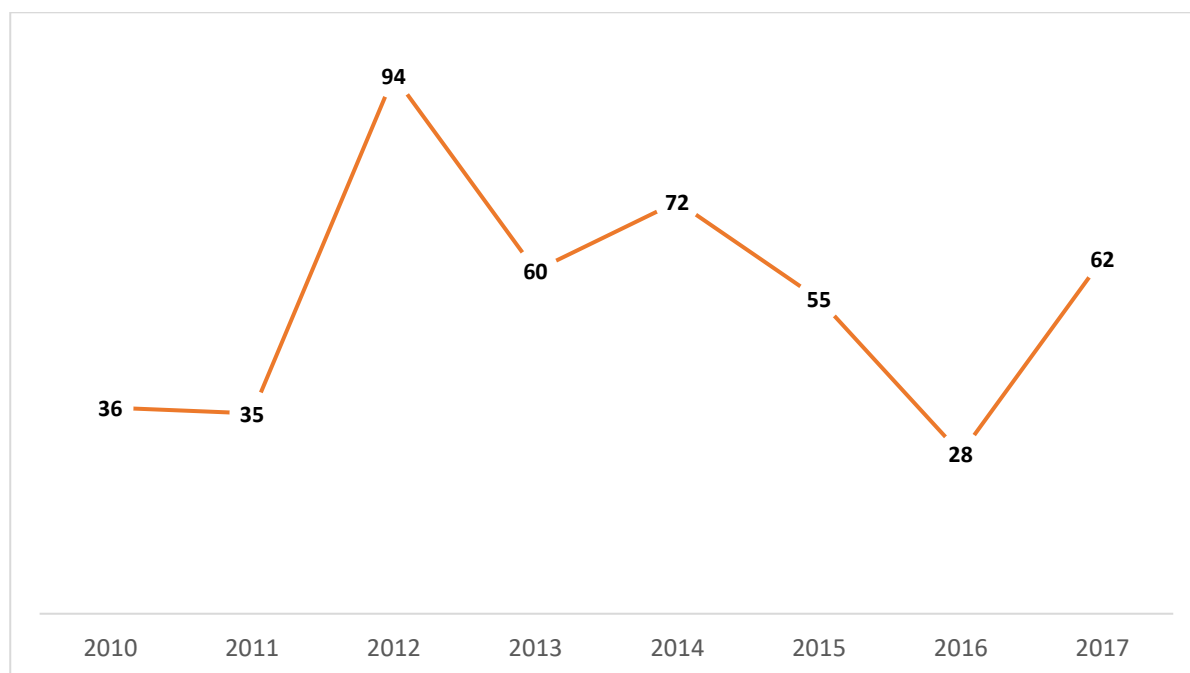
Specific activities will include:

- Development and approval of an updated policy on prevention of sexual harassment, exploitation and abuse
- Roll-out of mandatory e-Learning on expected staff behaviour and code of conduct
- Face-to-face training-of-trainers workshop for the focal point persons working with implementation of the Core Humanitarian Standard commitments. The workshop will train the focal point persons in how to work with partners and communities on awareness raising around our commitment to welcome complaints and to prevent sexual harassment, exploitation and abuse.

#### 4. Complaints received in 2017

In 2017, DCA received a total of 62 complaints including both sensitive and non-sensitive complaints at Head Office in Copenhagen.

The graph below shows the development in the number of complaints received at Head Office over the past eight years:



The fluctuations we can see can be explained by specific activities or campaigns – please see section 4.1 on operational complaints for detailed analysis.

Globally, we received a total of 991 complaints, of which 972 were non-sensitive complaints and 929 of them were received at country office level. This is the first year where we report on the total global number so there is no baseline that allows us to analyse trends or compare with previous years. However, when we compare the total number of complaints to the number of people we reach, the many stakeholders we engage with and the complexity of the world we work in, we do not find the numbers shocking or disproportionately high. In fact, we see an increase in the number of complaints as a success: the indication is that our staff and stakeholders trust us to deal with their grievances in a responsible and safe manner.

Below, we give a breakdown of types of complaints received.

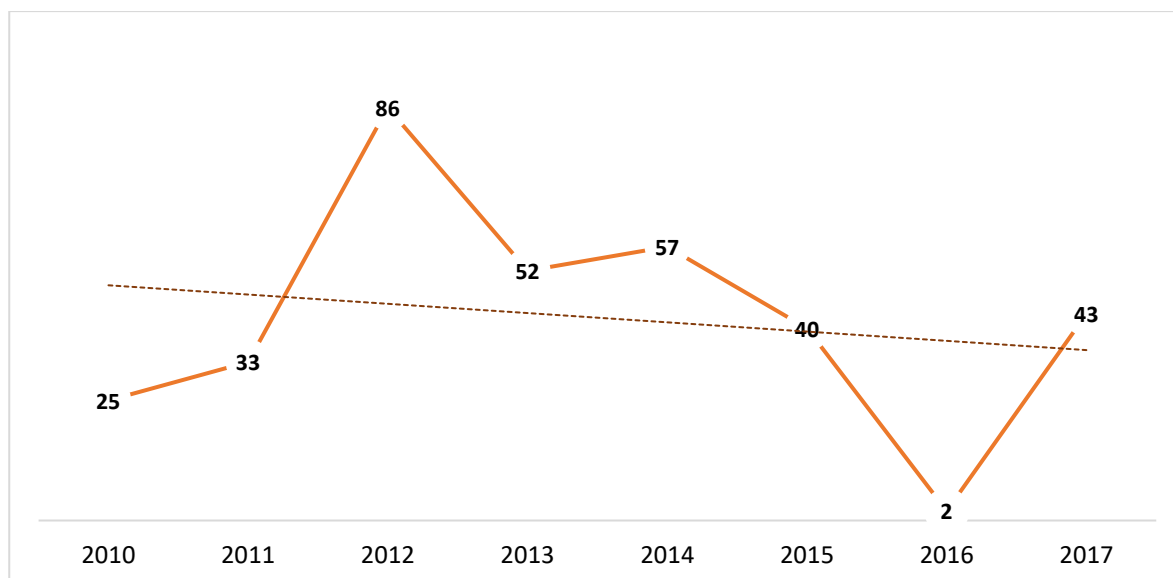
##### 4.1. Non-sensitive complaints

Non-sensitive complaints are handled as close as possible to where they arise. In other words, non-sensitive complaints that are raised in Denmark are handled in Denmark, and likewise complaints raised in Ethiopia are handled in Ethiopia.

Globally, we received, recorded and responded to 972 non-sensitive complaints in 2017.

### Non-sensitive complaints in Denmark

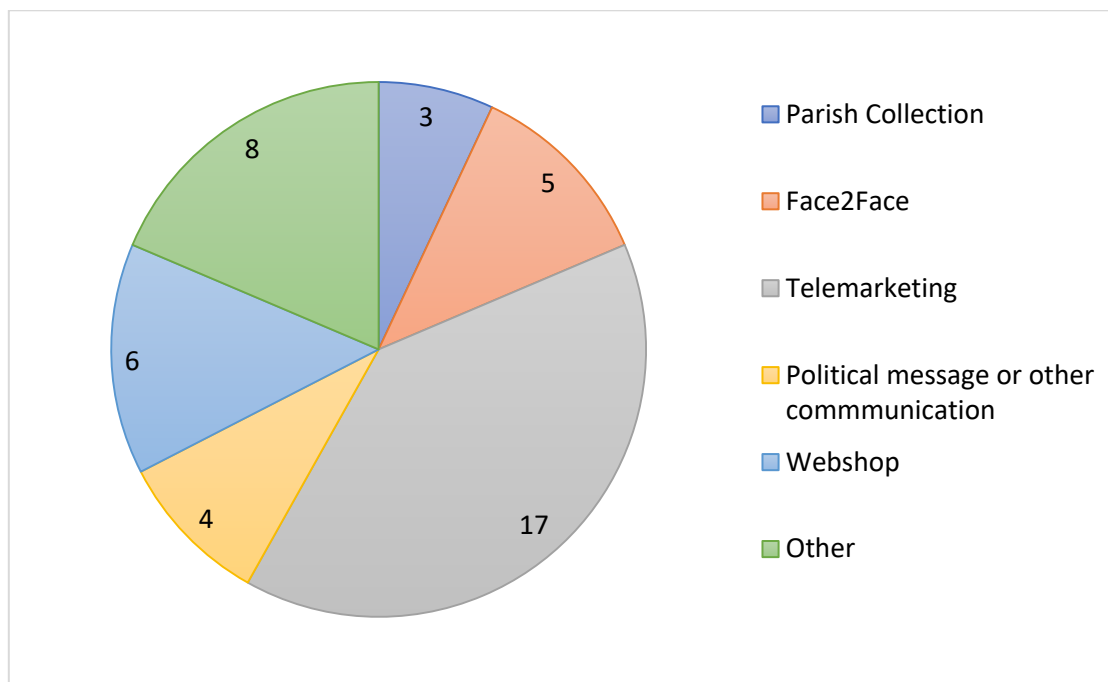
In Denmark, we dealt with 43 non-sensitive complaints. In comparison to 2016, this was a substantial increase, but when we look further back, this figure reflects more or less the average:



The dramatic drop in 2016 is most likely an expression of the fact that not all non-sensitive complaints reached the official channels but were directed either to our general email addresses or to specific people. In 2017 we increased the visibility of the official channel on our website and made efforts to ensure that complaints reached the official channel, and this is the likely explanation for the number of complaints returning to the average. The year in which there was an exceptional increase (i.e. 2012) reflects reactions to some of the more controversial campaigns and advocacy efforts by DCA in that year, which included the building of a wall at the Danish Music Festival in Roskilde to raise awareness about the conflict in Palestine.

Looking at the complaints received in 2017, the 43 non-sensitive complaints fall within six overall categories:





Most of these complaints related to our telemarketing efforts and the main content is people who wish to be taken off our call-lists. Considering the high number of individuals we reach, we think 17 is a reasonable number, though we continuously strive towards zero complaints. The same applies to complaints related to our Face2Face work on the streets in Danish cities. The complaints related to the Webshop were mostly of a technical nature and were quickly resolved. The complaints related to our political messages or other communication efforts were reactions to articles or statements made by our General Secretary, or to choices made in our publication “Magasinet”. These reactions are to be expected when we express sometimes bold opinions about contested topics such as the conflict in Palestine or choosing partnerships with controversial personalities such as Medina.

All complaints were resolved and the complainants received a response from relevant members of staff in DCA.

#### Non-sensitive complaints received in our country-offices

The 929 non-sensitive complaints we received in our country-offices in 2017 have all been addressed and resolved.

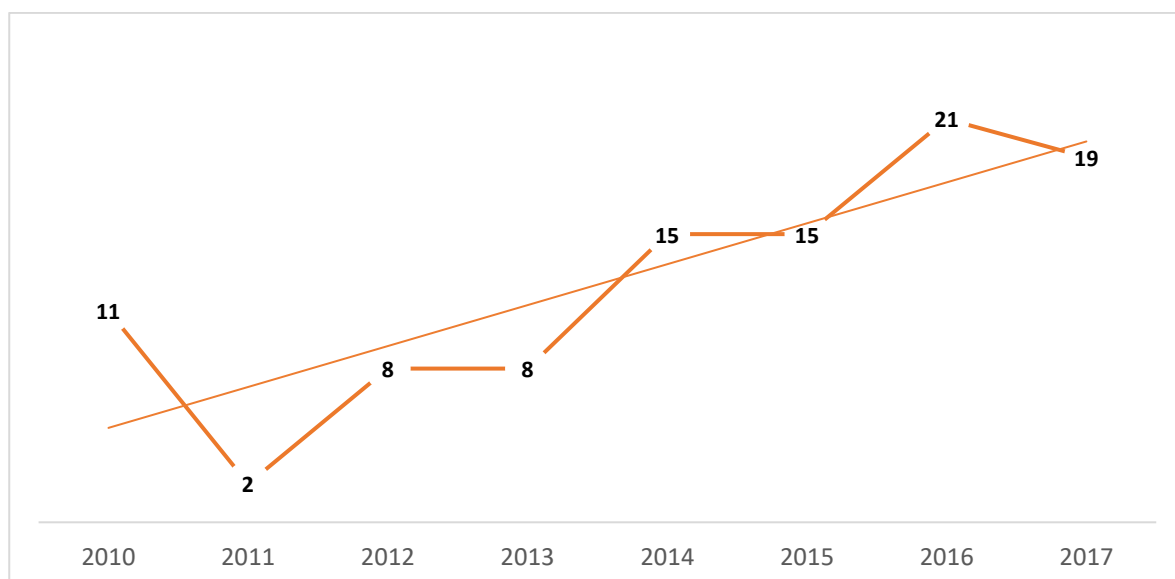
There is an uneven distribution of complaints between DCA countries, which does not necessarily reflect a huge variation in the quality of the work we carry out in the respective countries. We assume that the following four key factors influence the numbers of complaints received; these factors will be taken into consideration when adjusting and refining the DCA method for receiving and handling complaints in the future:

1. Distinguish between feedback and complaints: some of the complaints recorded are evidently closer to feedback than actual complaints. We are looking into how to address this issue across countries.
2. In some countries we have been more proactive in collecting complaints by sending out enumerators to gather feedback, but also to register complaints. As a consequence, the number of complaints registered in these countries is relatively high compared to countries where complaints are filed by beneficiaries/stakeholders who themselves (on their own initiative) access our points to complain.
3. There are countries where DCA implements projects directly and other countries where we primarily implement activities through local partners (NGOs, civil society organisations, religious groups etc.). When a partner is the direct implementing party, they will often receive the complaints, which in most cases will not be registered in DCA's complaints system. These two different ways of working have influence the number of DCA complaints received.
4. Some DCA countries have invested more in raising awareness among beneficiaries and stakeholders about the possibility to complain and in DCA's own procedures for registering and reporting on complaints.

DCA is determined to become better at reaching our beneficiaries and stakeholders with information about our complaints handling mechanisms and the types of grievances that it welcomes. These efforts will hopefully be reflected in an increased number of complaints across our activities. We will welcome and appreciate this as a means for learning and continuous improvement of the quality, relevance and effectiveness of our work.

#### 4.2. Sensitive complaints

All sensitive complaints are reported to the DCA Head Office, Copenhagen, and handled according to strictly defined principles and procedures by designated staff with the mandate to do so. In 2017 we received a total of 19 sensitive cases, which was two less than in 2016 but still maintained a trend that indicates a continuous increase in numbers over the past seven years:



We see this trend as a positive indication that more and more stakeholders trust us with their grievances, also the sensitive issues. Considering the contexts in which DCA staff and partners operate, we still believe there is a possibility of underreporting, and therefore we see the rising numbers of cases as an indication of a success in the way we communicate our complaints handling mechanism. That being said, we are very serious in making sure that learning and improvement is extracted from every single complaints case – we do not wish to repeat mistakes, and we strive to ensure that failures or weaknesses identified by a complaint will inform future activities.

Of the 19 sensitive complaints, seven related to issues that were highly sensitive for the persons involved. We choose not to report publicly on these cases out of respect for the safety and legal rights of those involved. The general breakdown of those seven cases is as follows:

1. Five involved internal staff matters of behaviour either within DCA or in partner organisations (four in DCA 1, one in a partner organisation). All cases were resolved through mediation and had no direct disciplinary consequences.
2. Two involved suspicion of sexual misconduct. Both were from within DCA and were investigated. For one of them we hired an external investigation expert who proved the allegations to be false. The other case was resolved through mediation to the satisfaction of both the alleged victim and others involved

The remaining 12 sensitive complaints related to real or alleged breaches to our anti-corruption principles. Below is a detailed description of each case, of how it was handled and what lessons we took away.

#### **1. January 2017: False accusation of corruption in partner organisation**

**What happened:** Selected members of senior management in DCA received an official looking email from a sender that claimed to be the local anti-corruption authority. They inquired about one of DCA's partners in the country and said they had reason to suspect serious fraud issues, without specifying which. They asked DCA to provide many details and answers and requested our full cooperation in their investigation.

**What we did:** DCA replied that we would look into the matter and respond, and later reached out again for some detailed information. No response was ever received. It was then discovered that the sender's email-address was false, and hence the complaint was in fact an attempt to harm DCA's partner. DCA sent a final email to the sender making it clear that we would not collaborate and not respond to the request.

**What we learned:** The case stressed the importance of the initial vetting and an understanding of who the sender is. The specific context of the complaint provides good reason for sound scepticism in light of the severely difficult circumstances that civil society organisations operate under. Especially those defending human rights.

#### **2. January 2017: Two members of staff in a partner organisation dismissed for fraudulent activities**

**What happened:** In January 2017, DCA became aware that a partner organisation in Malawi had dismissed two members of staff on grounds of suspected fraud. The two members of staff had allegedly committed fraud by inflating salary rates of employees. The fraud did not affect DCA's activities with the partner organisation and no loss was incurred by DCA projects.

**What we did:** The partner agreed with DCA to initiate an in-depth financial review to ascertain their capacity through a review of their systems and human resource capacity. Moreover, the partner hired a 'quality and risk management officer' to prevent similar future incidences. The financial review was carried out as an independent audit. Nothing alarming was found. DCA decided to continue the partnership so far and enjoys very good dialogue with the management of the organisation. DCA will of course follow the developments and improvements closely.

**What we learned:** It is important that DCA continue to support partners with financial and procurement capacities to be able to identify potential fraudulent activities. Our ongoing monitoring was able to detect some suspicious activities, and this is a good practice that adds value to our relationship.

### 3. January 2017: Suspected misuse of 35,000 DKK with partner in Malawi

**What happened:** The case started because a donor to DCA and the partner in question asked DCA to help them in a dialogue around some ineligible costs that had caused the donor to suspect misuse by the partner organisation. The process made DCA decide to stop all payments to the partner until it was possible to re-establish confidence in their financial management systems.

**What we did:** A routine financial monitoring visit was carried out by DCA's finance officer in early February 2017. The monitoring visit proved to be a good way to identify red flags or indications of misuse related to DCA projects. The conclusion was that the partner had very weak systems for financial management and that they had spent approximately DKK 35,000 without DCA's authorisation – which thus made the expenditure ineligible.

DCA agreed to a repayment schedule for the partner and continues to be in close dialogue with them about strengthening their financial systems and procedures.

**What we learned:** Again, we learned that strong systems are instrumental to deliver effectively on project outcomes. By supporting partners through our capacity building and mentoring interventions, we seek to build strong systems. We therefore continue to engage our partners in dialogue on ways to strengthen their system capacities.

### 4. March 2017: Misuse of funds by partner - Partnership terminated

**What happened:** A thorough financial review of a partner organisation in Zimbabwe concluded that the partner organisation did not live up to the minimum standards for financial management. DCA found that the organisation could not account for an amount around 160.000 DKK.

**What we did:** The partnership with the organisation was terminated and the project activities transferred to another partner. In terms of recovering the lost funds, DCA spent almost a year

staying in continuous dialogue with the management of the organisation. Eventually the funds were repaid by the partner in January 2018.

**What we learned:** The case stresses the importance of conducting regular thorough financial monitoring to uncover misuse and mismanagement. Moreover, a continuous dialogue with the previous partner organisation led to recovering the funds, which is of course considered a great success.

## 5. March 2017: DCA staff extorted by security guards

**What happened:** In the process of moving offices, a DCA staff member was followed by two men from the national security, who upon arrival at the new compound asked for documentation for the two generators that DCA was moving from one premise to the other. Because this was in the middle of a moving process, the staff member was only able to present the guards with documentation for one of the generators but agreed to return with the other documentation the following day. Unfortunately, the situation developed in a way that made the staff member feel threatened, and the security guard was clearly looking for a payment, and was not interested in offering documentation or receipt in return. Our staff member refused numerous times, and made a great effort to negotiate and discuss the matter with the guards, but eventually had to pay a small amount to escape from a situation in which the staff member feared for his safety.

**What we did:** Subsequently, the DCA staff member reported the incident to the complaints mechanism at Head Office level, in line with policies and procedures. The individual was asked to write a sworn statement, describing the incident in detail, which was then discussed by an ad hoc anti-corruption committee representing both the anti-corruption advisor and senior management.

**What we learned:** This incident illustrates the very difficult security situation that DCA operates under in some of the countries where we are present. As regards learning from this event, it underlined the importance of having all documentation ready for presentation at all times.

## 6. March 2017: DCA staff extorted when exchanging money

**What happened:** DCA staff were exchanging money but were incorrectly accused by national security officials of having presented false dollar notes. The officers threatened to send the DCA staff to jail. Clearly under threat, the staff had to pay the fine presented by the officers, which is according to DCAs guidelines on how to act when under threat to life, limb or liberty.

**What we did:** Subsequently, the DCA staff reported the incidence to the complaints mechanism at Head Office level, in line with policies and procedures. They were asked to write a sworn statement, describing the incident in detail, which was then discussed by an ad hoc anti-corruption committee representing both the anti-corruption advisor and senior management.

**What we learned:** This incident illustrates the very difficult security situation that DCA operates under in some of the countries where we are present. There is nothing much DCA can do to prevent situations like this in a context such as the one in South Sudan. However, it is always important that staff know how to act and how to protect themselves.

## 7. April 2017: Irregularities in a cash distribution programme

**What happened:** In April 2017, DCA was made aware of alleged fraud connected to a pilot cash transfer project that was being implemented by one of our partners, but the fraud involved did not affect DCA funding. It was found out that 17 undistributed cards has been spent without ever being delivered to the hands of beneficiaries. The total loss incurred to the programme was relatively low at a total of 3,500 DKK. These costs were covered by the partner's own funds.

**What we did:** DCA initiated an internal investigation together with the head of finance in the partner organisation. A thorough investigation was conducted on site, which concluded that fraud had indeed taken place though the exact scenario could not be established.

Senior management from both DCA and the partner organisation made a number of clear recommendations to be followed up by the partner organisation in relation to the programme. With the new procedures in place, the partner should gain better control of the programme, and future attempts at misuse will be discovered immediately. Staff were informed that future misuse will not be tolerated and will have both disciplinary and legal consequences.

**What we learned:** The investigation report contained a number of important lessons learned in relation to cash transfer programming. The lessons are valuable for DCA's continued work in the field. The findings and recommendations were therefore shared with relevant stakeholders to ensure learning.

## 8. May 2017: Routine audit report revealed suspicion of fraud with a partner of a partner organisation

**What happened:** A routine audit report signalled a red flag on possible fraud within a partner of a partner organisation in one of DCA's programmes. DCA had not been informed about the situation prior to receiving the audit report.

**What we did:** DCA reached out to its immediate partner to ask for details and clarification. The partner could elaborate that the issue was not intentional fraud, rather very weak financial management capacities which have since and continuously been addressed. The issue had not resulted in any loss of funds or changes to the programme.

**What we learned:** This case gave DCA an opportunity for a good dialogue with the partner of the partner with a view to clarifying reporting lines and procedures in similar cases.

## 9. May 2017: Anonymous complaint received in complaints box about irregularities in partner organisation, but the complaint could not be addressed.

**What happened:** the complaints focal point person in a country office found an anonymous complaint in the complaints box. The complaint contained several allegations of mismanagement

and irregularities in a partner organisation and was allegedly brought forward by a current or former employee. There was no concrete evidence or descriptions of events that could lead DCA to follow up or know what to look for and where to look.

**What we did:** DCA could not follow up on the complaint as the complainant was anonymous. Moreover, there were reasons to believe that the complaint might have been motivated by personal frustration. It was therefore decided not to go further with investigating the matter. The motives behind the complaint could be many, and the context in question is highly sensitive. DCA decided to stay alert to any signs of misconduct but could not recognise any signs that could substantiate the allegations raised in the complaint.

**What we learned:** This case illustrates why anonymous complaints are generally not accepted in DCA's complaints handling mechanisms. When there is no way of contacting to a complainant for further details, it is often impossible to follow up. However, we were able to consult relevant reports and people with knowledge of the partnership (past and present) that raised no red flags which could justify further investigation into the unsubstantiated allegations made.

#### 10. May 2017: Suspicion of irregularities in the Kakuma Refugee Camp in Kenya

**What happened:** DCA was indirectly brought in on a case of suspected irregularities in the refugee camp in Kakuma, Kenya. The case was raised by the Danish Ministry of Foreign Affairs, which had been informed by UNHCR about possible irregularities in their programme. An investigation by UNHCR had indicated that other actors in the camp might also be implicated by what seemed to be systematic practices of abuse of power by staff in UNHCR. Initially, DCA's local partner were also questioned. Eventually the investigation showed that DCAs partner was not in any way involved in the irregularities or affected by them.

**What we did:** DCA awaited the finalisation of the investigation by UNHCR, and moreover reached out to our local partners for further information and insight.

**What we learned:** While the case turned out not to be related to DCA activities or funding, it clearly illustrated the vulnerabilities involved in situations like to one in a refugee camp. Massive power inequalities and desperate situations are fertile ground for abuse of power; as humanitarian actors, we must always stay alert and aware of our increased responsibility.

#### 11. December 2017: Embezzlement by a member of staff in DCA programme in CAR

**What happened:** When closing one activity of the project that had been run by a (now previous) DCA employee on a short-term contract in the Central African Republic (CAR), it turned out that the person had in fact been producing false invoices for activities that he never carried out. A number of interviews were made at the project site, which confirmed the suspicion of his misconduct. The (now former) DCA employee had diverted money meant for project activities to himself through the use of false invoices.

**What we did:** As soon as this was discovered, management wanted to look further into this and made the employee aware that actions like these are unacceptable and will have disciplinary consequences. As a result, the employee resigned from his position.

DCA launched a legal procedure with the CAR labour inspectorate to be able to recover the embezzled funds but failed and hence had to cover the loss with own funds. The total loss amounted to xx DKK.

**What we learned:** To prevent similar situations in the future, a finance controller at DCA HQ is following the financial management closer for the coming months, and plans are being made for further capacity building activities of local staff.

## 12. 2017: Reports of continuous requests for facilitation payments in a DCA focus country

**What happened:** A member of staff chose to report to DCA about a series of requests for facilitation payments presented by the local authorities in the country in question. The report described how these incidences happened routinely and repeatedly, and how frustrating it was to the activities and morale of the staff in the country office. In some instances, the staff were successful in refusing to pay, through referring to policies against such payments etc. In other cases, the situation would develop into extortion, and hence a payment had to be made as a response to a threat. In all instances this situation affected the effectiveness and morale of the activities undertaken or intended by the member of staff being held back.

**What we did:** DCA can do little to address these challenges on our own, especially in unsafe environments. Hence for the purpose of documentation, the incidences were registered and filed, and the relevant tips and tricks for avoiding paying were shared in subsequent training and dialogue.

**What we learned:** We learned that collective action with other actors is key in the fight against facilitation payments and that DCA still has some way to go in encouraging and responding to reporting on requests for facilitation payments.

This concludes the complaints report 2017. Questions, comments and suggestions can be directed to the complaints advisor at DCA's Head Office in Copenhagen and will be welcomed and addressed in the best possible manner.