



Our Work

COMPLAINTS RECORD REPORT 2017



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COMPLAINTS RECEIVED AND PROCESSED BY CARITAS DENMARK

This is Caritas Denmark's first annual complaints record report.

The report contains:

1. An introduction to Caritas Denmark's Complaints Policy and Procedures
2. A presentation of the complaints Caritas Denmark has received and processed in 2017
3. A presentation of the actions taken by Caritas Denmark to assist our partners in assessment of their local complaints mechanisms

1. Introduction to Caritas Denmark's Complaints Policy and Procedures

Background

Caritas Denmark believes that the most important measure for a society's development is how the poorest members live and to what extent they benefit from the society's progress and goods. The very same consideration applies for our work; it cannot be judged only on the success stories and documented achievements. The failures, mistakes and challenges are just as important to capture to see the full picture and to constantly improve on our delivery to those in need. Accountability to us therefore means continuously striving to improve the quality, learning and effectiveness of our national as well as international programmes.

Caritas Denmark believes that tasks should be performed and decisions should be made as close as possible to the persons affected by them. Our complaints handling policy therefore assumes that complaints of our beneficiaries and other local stakeholders are better handled by our local partners, while complaints of our local partners and international stakeholders are handled directly by Caritas Denmark. We will support our partners to assure their responsibilities in this regard.

**Caritas Denmark's
complaints handling
mechanism aims to:**

- improve our accountability to our partners and beneficiaries
- make us responsible for our activities and decisions
- ensure the respect and dignity of those wishing to raise a complaint
- raise awareness amongst stakeholders of their right and possibility to complain
- protect and guide Caritas Denmark staff in handling complaints
- allow us to rectify mistakes and alert us to problems in our work
- help us continuously to learn and improve
- counteract corruption and assaults

This principle is supported by the real-world condition that Caritas Denmark only implements through partners, who are responsible for the involvement of beneficiaries.

Consequently, the Caritas Denmark complaints handling mechanism includes procedures targeting primarily reception of and responding to complaints from partners and international stakeholders. For beneficiaries and other local stakeholders, Caritas Denmark will promote the need for complaints handling mechanisms with partners and will provide support to them in developing such mechanisms. However, complaints from beneficiaries and other local stakeholders received directly by Caritas Denmark or via local partners – should such arrive – will obviously be treated in line with our complaints handling policy and procedures.

The key assumptions and principles on which our complaints mechanism is based, are further described in Caritas Denmark's Complaints Policy and Procedures.

Who can make a complaint?

The complaints handling policy encourages two levels of complaints handling mechanism: (1) complaints filed directly with Caritas Denmark and (2) complaints filed with a local partner organisation. While Caritas Denmark will process complaints from all sources, the two levels are intended and designed to be solved as close to their source as possible:

Complaints filed directly with Caritas Denmark from:

- individuals officially representing a partner organisation
- any individual member of staff of a partner organisation
- proxies for a member of staff of a partner organisation
- volunteers and interns of a partner organisation
- consultants, auditors and other contracted short-term engagements or visitors
- government representatives, NGOs and other stakeholders
- users of the Caritas Centre in Copenhagen and participants in PREP trainings and parish activities
- Caritas Denmark staff

Complaints filed with local partners from:

- beneficiaries of local partners supported by Caritas Denmark funded activities
- other stakeholders affected by the implementation of local partner activities, including local leaders, government representatives, representatives of other local NGOs

Types of complaints

Caritas Denmark categorises complaints as belonging to one of three types: operational complaints, fraud related complaints, and sensitive complaints.

Operational complaints relate to the implementation of Caritas Denmark's programmes and activities, both in Denmark and abroad, or an advocacy/policy position taken by Caritas Denmark or a partner organisation with whom Caritas Denmark works in solidarity. For instance, it could be a complaint about late arriving project funds causing programme delays.

Fraud related complaints can involve any type of irregularity such as corruption, misuse of project resources, bribery, nepotism, embezzlement etc. These are handled in accordance with the regulations of the Danish Ministry of Foreign Affairs and the procedures laid out in the Caritas Denmark international manual.

Finally, the sensitive complaints including sexual exploitation and other abuse of people or power, or other gross misconduct or malpractice involving Caritas Denmark or partner staff. This includes both staff violation of international protection policies, organisational code of conduct and/or ethical codes, as well as threats and assaults made against Caritas Denmark or partner staff.

Due to their different nature, these three types of complaints are handled in different ways taking specific requirements and any risks to parties involved into consideration. Any complaints that indicate that a possible criminal offence has been committed should be referred, either by Caritas Denmark or its partner, to the statutory authorities responsible for investigating such matters.

All complaints are in the first instance received by Caritas Denmark's internal complaint committee, appointed by the Board, and consisting of the Secretary General, the Head of Administration and the International Team Leader. The complaints handling procedures are further described in Caritas Denmark's Complaints Policy and Procedures.

2. Presentation of the complaints received and processed by Caritas Denmark in 2017

In 2017 Caritas Denmark developed a new complaint mechanism. We received 2 official complaints directly to Caritas Denmark, and we have not yet received information from our partners on the complaints they might have received in 2017. This being Caritas Denmark's first annual complaints record report, we will therefore give focus only to the two complaints received directly through our new complaints mechanism on www.caritas.dk. Later complaints record reports will also include complaints handled by our implementing partner organizations.

Summary of types of complaints

Total number of complaints received:	2
Operational complaints:	0
Fraud related complaints:	2
Sensitive complaints:	0

Information sharing on fraud related complaints

In case of fraud related complaints Caritas Denmark is obligated to follow the guidelines of the Danish Ministry of Foreign Affairs, which requires full transparency in the handling of fraud related complaints and regularly publishes the cases on its website.

Respecting these and similar requirements from the media, beneficiaries and other stakeholders, Caritas Denmark wishes to share as many details as possible on fraud related complaints. However,

not all information is public. To safeguard the safety, security, rights or reputation of any individual involved, including the complainant and those affected by the allegations, no specific names of individuals, dates, places or other sensitive information will be shared in this report.

Fraud related complaints made public in 2017

C-1561 – Uganda, TWDA: Irregularities in the use of project vehicles and in recruitment of staff

Contents of complaint: Caritas Denmark received an email from former volunteer with the partner organization TWDA, stating that resources in the project in his opinion were abused in various ways. Allegations were made that project vehicles were being used for private purposes, that there was a case of nepotism in hiring staff, and that certain staff was paid under the table.

Actions taken: The allegations were of a nature that required further investigations, and the complaint committee decided 1) to suspend the activities in the project, apart from staff salaries, during the investigation; 2) to let Caritas Denmark's local auditors do an investigative audit; 3) to report the suspicion of irregularities to MoFA; 4) to set up a task force in Caritas Denmark to follow the development in the case; and 5) to establish a logbook.

The investigative audit showed no major irregularities, and it turned out that some of the allegations were based on misunderstandings. However, Caritas Denmark did find some issues in the auditor's report concerning, and these were presented to the management of TWDA. The suspension of the project was lifted under the condition that the auditor's recommendations were followed. TWDA committed to implement the recommendations, and the case was closed.

Lessons learnt: It was not clearly specified neither in Caritas Denmark's contract with TWDA nor in their internal procedures or guidelines, that private use of project vehicles is unacceptable to Caritas Denmark, whereas this seems to be culturally accepted. Thus, based on this complaint, Caritas Denmark has revised its Grant Agreement with partners to include a section on the use of project vehicles and there will be a closer monitoring of the vehicle logbooks by Caritas Denmark.

C-1557 – Uganda, Caritas Lugazi: Irregularities in the use of project vehicles and in recruitment and refurbishing processes

Contents of complaint: Caritas Denmark received an anonymous complaint concerning Caritas Lugazi bringing attention to alleged 1) private use of project vehicles, 2) recruitment of staff and forced sharing of salary, and 3) attempts of covering up a poorly managed refurbishing process. The complainant related his complaint to the on-going investigative audit of TWDA, which he felt should be extended to include Caritas Lugazi.

Actions taken: These allegations were also of a nature that required further investigations, and the complaint committee decided 1) to suspend the activities in the project, apart from staff salaries, during the investigation; 2) to let Caritas Denmark's local auditors extend their on-going investigative audit to include Caritas Lugazi; 3) not to re-negotiate a new partner contract for 2018 and not to transfer any funds in 2018 until the results of the audit were available; 4) to report the suspicion of irregularities to MoFA; 5) to set up a task force in Caritas Denmark to follow the development in the case; and 6) to establish a logbook.

The investigative audit showed several irregularities in the vehicle logbook as well as non-transparency in processes for recruitment of staff, while the findings concerning the refurbishment process showed no major irregularities. Caritas Denmark presented the findings and our conditions for a continuation of the partnership to the management, who committed to follow the auditor's recommendations and the conditions presented by Caritas Denmark. The case was closed.

Lessons learnt: It was not clearly specified neither in Caritas Denmark's contract with Caritas Lugazi nor in their internal procedures or guidelines, that private use of project vehicles is unacceptable to Caritas Denmark, whereas this seems to be culturally accepted. Thus, based on this complaint, Caritas Denmark has revised its Grant Agreement with partners to include a section on the use of project vehicles and there will be a closer monitoring of the vehicle logbooks by Caritas Denmark. Further, since both the above complaints were related to the use of project vehicles and vehicle logbooks, Caritas Denmark will provide training of all partners in Uganda in the use vehicles and proper registration in vehicle logbooks.

3. Presentation of the actions taken by Caritas Denmark to assist its partners in assessment of their local complaints mechanisms

To Caritas Denmark it has a high priority to assist our partners in establishing, implementing and developing their own complaints mechanisms and policies, ensuring a timely, fair and appropriate management of complaints, which prioritizes the safety of the complainant and those affected.

Thus, Caritas Denmark in 2017 initiated a comprehensive process of accompanying its partners in their work with development and implementation of complaints policies and procedures. Among other initiatives, checklists have been on the drawing board to ensure a uniform assessment of the partners' complaints handling mechanisms, and to raise awareness with the partners of the importance of their safeguarding of personal data, including the personal and possibly sensitive data related to complaints. The scope for Caritas Denmark is not just to be able to assess its partners, but more so to be able to support and assist its partners in the most needed areas of their structures and procedures, and not least to be able to uncover these areas and the necessary improvements or developments in close dialogue with the partners.

The process of accompanying Caritas Denmark's partners in their efforts to comply with international standards for humanitarian and development work, especially concerning the management of complaints, will continue in 2018.

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