



COMPLAINTS HANDLING POLICY AND PROCEDURES

List of Content

COMPLAINTS HANDLING POLICY.....	3
1.1 Purpose of this Complaints Handling Policy.....	3
1.2 Key Assumptions and Principles of our Complaints Handling Policy	3
1.3 Scope of this Complaints Handling Policy.....	6
1.3.1 Who can make a complaint under this policy	6
1.3.2 How to complain to Caritas Denmark	6
1.3.3 Key areas and Types of Complaints	7
COMPLAINTS HANDLING PROCEDURES	7
2.1 Caritas Denmark Complaints Handling Mechanism	7
2.1.1 Procedures for Participatory Design.....	7
2.1.2 Procedures for Awareness Raising	8
2.1.3 Procedures for Receiving and Classifying Complaints	8
2.1.4 Procedures for Referral of Complaints	9
2.1.5 Procedures for Handling Anonymous Complaints	9
2.1.6 Procedures for Handling Fraud Related Complaints	10
2.1.7 Procedures for Handling Sensitive Complaints	10
2.1.8 Resolution and Right to Appeal.....	11
2.1.9 Sanctions for False Accusations.....	11
2.1.10 Handling of complaint withdrawal	12
2.2 Partner Complaints Handling Mechanisms	12
2.2.1 Awareness and Acknowledgement	12
2.2.2 Mentoring and Monitoring.....	13
2.3 Recording and Reporting.....	13
2.4 Learning and Improving.....	14

SECTION ONE

COMPLAINTS HANDLING POLICY

1.1 Purpose of this Complaints Handling Policy

It is Caritas Denmark's declared objective that all human persons acquire the possibility and freedom to realise their full potential, meaning that development results cannot only be measured by calculating the general or average progress. 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 goods¹. 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 as we place our partners, the vulnerable beneficiaries and the communities that they serve at the centre of our work.

However, accountability is more than feedback and lessons learnt. Caritas Denmark honours our commitment towards a world where every individual's rights² and dignity³ are respected. In our work this means taking responsibility for listening to the needs, concerns and views of our supporters, donors, partners and not least the communities that they serve. It means acting on what they are telling us and being answerable to them for the decisions that we make. It means making sure that each and every individual involved in our work has the possibility to speak up if they are displeased with our services or with the treatment they have received.

Therefore Caritas Denmark will review our accountability systems including improvement of our complaint handling mechanism with the aim to:

Caritas Denmark complaint handling mechanism aims to:

- improve our accountability to our partners and beneficiaries
- take responsibility for our activities and decisions
- ensure the respect and dignity of those wishing to raise an issue, concern or complaint
- raise awareness amongst partners, beneficiaries and other parties' 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 to continuously learn and improve and thereby increase the effectiveness of our programmes
- counteract corruption and assaults.

1.2 Key Assumptions and Principles of our Complaints Handling Policy

In line with our *Charter 4 Change* commitment on "*Localisation of Aid*", the main assumption of this complaint handling mechanism is based on Principle 6 of the Caritas Denmark Set of Values; Subsidiarity. Caritas Denmark believes that tasks should be performed and decisions should be made as close as possible to the persons affected by them. Only this way the individual human being and the communities can make their unique contribution to the development of society. Our complaint 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

¹ Caritas Denmark's Set of Values Principle 4 – The Preferential Option for the poor

² Caritas Denmark's Set of Values Principle 3 – Man's Rights, Responsibilities & Obligations

³ Caritas Denmark's Set of Values Principle 1 – The Inalienable Dignity of the Human Person

international stakeholders are handled directly by Caritas Denmark. We will support our partners to assure their responsibilities in this regard.

This principle is supported by the real-world condition that Caritas Denmark only implements through partners, who are responsible for the involvement of beneficiaries. Thereby the beneficiaries and other local stakeholders are rarely familiar with the funding sources behind the various activities of the local partners (in some cases they might not even know which local actors are responsible for providing which specific service) and that the communication between the beneficiaries/local stakeholders and Caritas Denmark is impeded by long distances, rare encounters, illiteracy, language barriers, poor access to internet etc. The rare exception is the (so far very few) beneficiaries of the Caritas Centre in Copenhagen, where Caritas Denmark is taking the first preliminary steps in direct implementation.

Consequently, the Caritas Denmark complaint 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 in line with the principles and practices outlined in this document. 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 this policy and in accordance with the procedures described in this document.

To ensure that a complaints mechanism is effective, trusted and therefore used depends on the following key principles:

Participation and Appropriateness

Mechanisms for handling complaints must be appropriate to the specific context within which they are intended to operate. They must be appropriate to the local context of where it is intended to operate, be in keeping with local legislation and fit with the specific nature of the programme being implemented. This will only be achieved if designed in a participatory way in consultation with its stakeholders. Therefore main user-groups of the mechanism must to the extent possible be included in its design to increase the likelihood of the mechanism being used. This means that the local partners are consulted in the design of the Caritas Denmark complaint handling mechanism described in this document, when relevant in the handling of the complaint, and are given the possibility to monitor how complaints are handled. Furthermore, Caritas Denmark will work with partners to ensure that local complaint handling mechanisms are established in consultation with the local beneficiaries in the identification of appropriate complaint options and of the channels for feedback to complainants. Partners are encouraged to give priority to involve community representatives in addressing complaints and resolving disputes, when applicable.

Safety and Protection

Potential dangers and risks to all parties involved will be considered in each process, including Caritas Denmark and local partner staff, complainants, witnesses and other parties involved. The mechanism should be designed to incorporate ways to prevent harassment, injury or harm to those wishing to raise an issue or complaint. Caritas Denmark will do its utmost to ensure confidentiality, offering physical protection if necessary and when possible, and to address the possibility of retaliation against those wishing to raise concerns or stand in witness. All information of a confidential nature will be stored safely.

Confidentiality and Security

Confidentiality helps create an environment in which people are more likely to raise concerns, complain or stand in witness to bad practice or incidents of abuse. People might not raise concerns

or complaints if they in doing so are in fear of reprisal or retaliation from Caritas Denmark or local partner staff or other community members or any other stakeholder. Confidentiality assures that any information given is restricted to a limited number of people and that it is not disseminated wider, therefore offering an element of protection and security to the complainant.

Anonymity and Malicious Intent

Anonymous complaints are more likely in the case of abuse (e.g. inappropriate behaviour by a staff member) than for more standard grievances (e.g. defective item distributed). For this reason, in keeping with the 'do not harm' principle, it is important to treat anonymous complaints seriously to avoid future potential harm. Anonymous complaints will be treated equally to complaints submitted by known complainants. Nevertheless, it is more common for anonymous complaints to be of a malicious nature comprising false accusations with the intent to harm the implicated individual or organisation. Complaints filed in bad faith – whether anonymous or not – will not be processed. They should however not be ignored, as they may indicate a level of dissatisfaction, grievance or local opposition to Caritas Denmark or our partners, which should be taken into account as potential challenge to effective implementation.

Transparency and Visibility

All potential users should be aware of the complaint handling procedures. They should be given the opportunity to understand its purpose, have sufficient information on how to access it and understand how it works. Complainants must when possible be informed of the outcome of their complaint. Caritas Denmark will annually on our website report on the nature and outcome of the complaints received, though in a manner protecting the implicated parties.

Objectivity and Fairness

All complaints are addressed in a fair, objective, and unbiased manner throughout the complaints process. All complainants will be treated respectfully, whether or not the complaint is justified and valid. Issues of conflict of interest will be identified to ensure objectivity.

Responsibility and Resources

It is the responsibility of Caritas Denmark to make it part of our culture to remind those with whom we interact that they can file a complaint about issues which are in breach of Caritas Denmark policies and international standards. Individual arrangements for disseminating the final version of this policy "in-country" will be put in place by the Caritas Denmark Accountability Coordinator, who also has a particular responsibility to encourage and advise the development and implementation of complaint handling mechanisms with our local partners to prevent malpractice or abuse. This will be done in close collaboration with and support from the responsible Programme Coordinator. It is the responsibility of Caritas Denmark management to make sure that all staff are familiar with the complaints handling policy and procedures to the extent that they are able to share this information with others. Caritas Denmark is committed to prioritise resources towards establishing, maintaining, and improving our complaints handling mechanism and that of our partners. The resource commitment towards partner organisations will mainly be honoured through guidance and technical support, but can in some cases also include financial aid in relation to e.g. investigations or awareness raising.

Zero tolerance

Caritas Denmark has zero tolerance against 1) any sexual activity with children under the age of 18, regardless of the age of consent locally (mistaken belief of age being no defence), 2) exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, and 3) any violent threats or actions.

1.3 Scope of this Complaints Handling Policy

A complaint is an expression of dissatisfaction about the standard or quality of our work, or is related to the actions or lack of actions taken by Caritas Denmark or partner staff that directly or indirectly cause distress to the affected party. It differs from negative feedback as it addresses when someone is not doing what they are supposed to or when someone is doing something that they are not supposed to. Though many concerns are raised and discussed between Caritas Denmark staff, local partners and beneficiaries, a formal complaint handling mechanism is required for those occasions when complaints cannot be resolved informally and an individual or organisation wishes to make their complaint a matter of record and to receive a formal response.

1.3.1 Who can make a complaint under this policy

This Complaints Handling Policy encourages that complaints are solved as close to their source as possible. However, Caritas Denmark will process complaints from all sources, including:

- 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 affected by the implementation
- users of the Caritas Centre and participants in PREP trainings and parish activities
- Caritas Denmark staff
- beneficiaries of local partners supported by Caritas Denmark funded activities.

Some activities taking place in Denmark, including the newly started Caritas Centre, the PREP trainings, and the few parish activities are implemented directly by Caritas Denmark. The users of these activities shall be informed of the Caritas Denmark complaints handling mechanism and consulted regarding the design of the complaints handling mechanism.

Caritas Denmark strives to ensure a conducive working environment for its staff and is proud to have a culture where staff feel comfortable voicing their grievances informally. Nevertheless, if need be, Caritas Denmark staff can make use of the complaints handling mechanism on the condition that they prior to formally filing their complaint more than once have raised the issue with the Head of Administration and/or the relevant Team Leader for their information and possible action. If this condition not abided to, the complaint will not be processed.

1.3.2 How to complain to Caritas Denmark

As we primarily work through partner organisations, we encourage that complaints that are best handled by our partners (who are locally available and who have a better insight into the local matters) are filed with them directly. However, any person who has a complaint that they feel is best handled by Caritas Denmark are most welcome to file that complaint directly with us.

To complain directly to Caritas Denmark one can:

- Write to Caritas Denmark's secretariat: caritas@caritas.dk
- Call Caritas Denmark's secretariat: +45 38180000
- Contact any employee through mail, phone or personal encounter during monitoring visits.
- Finally, we have a channel through our website: <https://caritas.dk/complaint-form-eng/?lang=en>

1.3.3 Key areas and Types of Complaints

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

Operational complaints relates 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.

SECTION TWO

COMPLAINTS HANDLING PROCEDURES

2.1 Caritas Denmark Complaints Handling Mechanism

The technical complaints handling procedures of Caritas Denmark might differ from those of our partners though these as well should be reflecting the principles of the Caritas Denmark Complaints Handling Policy described in section one of this document. In this section, first Caritas Denmark's complaints handling procedures are explained, secondly our guidelines for accompanying partners in the development and /or improvement of complaints handling mechanisms are described.

2.1.1 Procedures for Participatory Design

By mid-2017, Caritas Denmark launched a technical complaints option on our website. This was intended as an additional complaints pathway supplementing emails and verbal communication, which had previously been the commonly used means of filing complaints. It is the ambition of Caritas Denmark to continuously explore new options for improving complaints pathways in order to ease the burden of filing a complaint for any potential complainant. Caritas Denmark is therefore always interested in receiving suggestions for new complaints pathways and will bring forward such request regularly when appropriate occasions arise.

The activities in Denmark that are implemented directly by Caritas Denmark include three different beneficiary groups; 1) users of the Caritas Centre in Copenhagen, 2) participants in PREP trainings, and 3) participants in the parish level activities. For each beneficiary group, the National Department will consider the most appropriate means to consult the beneficiaries. Consultation plans will be developed and implemented throughout 2018 and ad hoc if additional beneficiary groups are added to the activity portfolio.

The submission of complaints is however only a small part of the complaints handling mechanism design. The larger part is the complaints handling procedure after submission. Hence, to ensure a participatory design the potential users of the mechanism should have the possibility to provide inputs on the policy and procedures. For this reason, all Caritas Denmark's partner organisations and other selected stakeholders - representing the main potential users –, shall have the opportunity to feed into this policy. When applicable, local partners are involved in the handling of complaints and resolution of disputes.

2.1.2 Procedures for Awareness Raising

This document is considered a “living” document and will be updated continuously as we learn and improve our complaints handling procedures. When a new partnership is initiated, the latest version is shared with the organisation in question as part of the package also including the Caritas Denmark Code of Conduct, Code of Ethics, Set of Values etc. Caritas Denmark Accountability Coordinator will go through this package with the new partner to make sure that they fully understand the content of all documents. Also, the latest version shall be attached to all grant agreements as part of the contractual grant obligations. The latest version of our Complaints Handling Policy and Procedures is always available on our website and a poster communicating this information provided for all partner organisations and for the Caritas Centre in Copenhagen.

2.1.3 Procedures for Receiving and Classifying Complaints

When a complaint is received, whether through the website mechanism, by mail, or by verbal communication it is forwarded to the Caritas Denmark Complaints Handling Committee (CCC). The CCC comprises four members appointed by the Caritas Denmark Board and currently consists of the Secretary General, the International Team Leader, the Head of Financial Department and Caritas Denmark Accountability Coordinator. The Secretary General is the CCC Chairman and the Accountability Coordinator acts as Secretary for the committee.

Complaints received through the website will automatically receive a reply explaining the process of complaints handling and sharing information on when feedback can be expected. The reply will have this document attached, in both English and French versions. For complaints received through email, either to caritas@caritas.dk or to an individual member of staff, the reply will be given by the CCC Secretary within 7 days. For complaints received verbally, this communication is delivered on site by the individual receiving the complaint. All Caritas Denmark staff is able to explain the complaints handling process.

When receiving a complaint, the CCC convenes as soon as possible to classify the complaint. In case of absence of a member, communication can be by email or phone. The members present can decide to prepare a proposal for handling of the case to the absent member for his or her approval.

In case of disqualification of a member of the complaints committee in relation to a specific complaint, the committee can decide: to process the complaint without participation of the disqualified member, to call upon a third person as ad hoc member, or to submit the complaint to the Board. In all cases of disqualification, the Board Chairman will be notified. The Board of Caritas Denmark will always process complaints concerning the Secretary General. Complaints against the Board of Caritas Denmark or individual Board Members will be processed by the Board of Caritas Norway.

Using the Caritas Denmark Complaints Classification Template, the CCC will classify the complaint by defining the type of complaint as operational, fraud related, or sensitive, which will guide the processing of the complaint. Once a complaint is classified as operational, fraud related, or sensitive, the next step will be for the CCC to consider the need for the involvement of the staff responsible for

the relevant country programme, crisis response programme, or department related to the specific operation.

Using the template the CCC will determine whether the complaint is indeed relevant to Caritas Denmark and not suitable for referral as well as whether the complainant is known or anonymous. Subsequently, the CCC develops a complaints handling action plan, which will be reflected in the template, and appoints a task force for its implementation. When applicable, local partners will be consulted in the development of the action plan, and can when appropriate be part of the task force. Particularly, the partners can be instrumental in resolving local disputes.

In the rare case that the task force will have the nature of an actual investigation team, travelling to the site to undertake an investigation themselves, particular attention will be paid to the composition of the team in order to prevent bias and ensure adequate skills. In sensitive cases for instance, an independent expert investigation team might be considered.

Starting January 1st 2018, all complaints received by Caritas Denmark will be given a case number in order to ensure a more systematic recording and documentation. The case number will be added to the template and a folder will be made reflecting the case number.

The task force will document each step of the implementation of their action plan in a log book filed under the complaints case number. Log books and case documents for operational complaints are kept on the Caritas Denmark X-drive, where it is accessible to all staff. The CCC Secretary is responsible for filling and filing the filled template. Once the action plan is implemented, the task force reports verbally the outcome to the CCC, who assesses whether the case can be closed or whether further action is needed. The action plan might consequently need revision during its implementation depending on the outcome of its related investigation, negotiation, mediation etc.

The complaints committee will inform the complainant of the outcome no later than one month from reception, if this person is accessible. In case an outcome is not reached within one month, the complainant will instead receive an update from the CCC. If needed, the CCC can request further information or documentation from the complainant.

2.1.4 Procedures for Referral of Complaints

If Caritas Denmark receives a complaint that is related to the activities or staff of a programme or organisation not funded by Caritas Denmark, the complaint will be referred directly to the organisation concerned or to local ombudsman to mediate and manage the complaint, where possible. It might be necessary for Caritas Denmark to support the complainant to seek a local ombudsman or to report to their local authorities and support services as appropriate and where safe to do so. Any action taken by Caritas Denmark in relation to referral of a complaint will be recorded.

2.1.5 Procedures for Handling Anonymous Complaints

Anonymous complaints should be treated with due seriousness. It may be possible to investigate anonymous complaints if there is sufficient background information given and/or possible witnesses. However, in case of anonymous complaints, the CCC shall make an assessment of the extent to which it is filed in good faith.

Anonymous complaints that appear as deliberate false accusations with the intent to harm the implicated individual or organisation are rejected, and the complainant is - if possible – informed accordingly, and hence provided the opportunity to appeal. In case of doubt as to the nature of the complaint, it will always be processed. Based on the template, the CCC will consider if a complaint identified as malicious is indicating an obstacle to implementation and if any action is necessary to

redeem such situation. Even if not processed, the complaint shall be given a case number and put to record for future reference.

2.1.6 Procedures for Handling Fraud Related Complaints

Also with fraud related complaints, a task force is appointed and it can be relevant to consider participation of staff responsible for the specific operation, if no suspicion exists against this or these individual employees. It will rarely be appropriate though to involve the implicated partner organisation in the task force. Instead, there will be close consultation with the local auditor, and in very serious or delicate cases, it can be recommended to consult trusted local mentors, who can provide guidance on cultural diplomacy, national legislation etc.

Otherwise, the procedures are the same as when handling an operational complaint, except that Caritas Denmark is obligated to follow the guidelines of the Danish Ministry of Foreign Affairs (MoFA). These guidelines involve that MoFA shall be informed within 14 days of suspicion and receive reports of every progress. Also, if the operation in question is funded by MoFA, MoFA should be consulted in case the programme activities are not suspended while investigations are ongoing and before closing a case.

MoFA requires full transparency in the handling of fraud related complaints and regularly publishes the details on their website. This information is thereby public, whereby the log book and case files can be kept on the X-drive, accessible to all staff. However, in the country where the complaint is originated, Caritas Denmark acts as discretely as possible while investigations are ongoing and makes a point of emphasizing that no one is considered guilty until proven so and that all suspicion raised is investigated whether or not we consider it creditable. No partnership is too tight or too valued to be excepted from this rule. In case irregularities are confirmed, the future of the partnership as well as legal action will be considered.

At the regular Board meetings, the Secretary General informs the Board of new fraud related complaints and of progress on the ongoing cases. The same information is shared with the Danish auditor when doing the annual audit of Caritas Denmark. Once the case is closed, the complainant will be informed of the outcome, if the person is known.

2.1.7 Procedures for Handling Sensitive Complaints

Sensitive complaints will be handled in strict confidentiality in order to protect all parties involved. Therefore, the log book and the case files will be kept on an exclusive drive only accessible by the CCC. These complaints must be handled (and filed) directly by the CCC, though in some cases in consultation with the Board, the Bishop or a partner Board or local Bishop. If not consulted in the handling, the CCC Chairman will immediately inform the Board Chairman of the reception of a sensitive complaint, of the steps described in the action plan by the CCC, and subsequently of the outcome.

Each case will be considered individually, in accordance with national legislation and expert advice when appropriate. Caritas Denmark will seek to follow best practice as has been documented and agreed for each of the respective countries in which we operate. For complaints involving children, the investigation will be undertaken in accordance with the Caritas Internationalis Children and Vulnerable Adults Safeguarding Policy.

Caritas Denmark has zero-tolerance in cases of any sexual exploitation or abuse or other abuse of people, whether children or adults. In such cases, validation of a complaint concerning a Caritas Denmark staff will lead to immediate termination of employment and legal actions will be considered. If the offending person is an employee of a partner organisation which is not supporting termination of the employment, the continuation of the partnership must be considered.

In cases of abuse of power, or other gross misconduct or malpractice, termination of the employment must be considered. If the employment is not terminated, any disciplinary action will be treated with confidentiality in order to protect the staff in question. In that situation, the complainant would merely be informed whether or not the complaint was substantiated and whether disciplinary action was taken, but not of the details of the disciplinary action.

The welfare of the potential victim(s) is one of the most important priority to Caritas Denmark. Therefore, prior to investigating a sensitive complaint, the CCC will explore both the national legislation and the availability of a safeguarding environment to which linkages can be established. Compensation (either in the form of cash or access to support such as therapy) for sexual exploitation and abuse victims as well as to children resulting from such is considered on a case by case basis. To the extent possible this is established as early in the complaints process as possible to avoid empty promises being made along the way.

Protection of victims, witnesses, investigators, as well as those accused are equally important and will prioritised as far as possible based on dynamic risk assessments. This consideration can also be relevant for fraud related complaints. Additionally, in sensitive cases the principle of confidentiality will be applied with a strict only-need-to-know-people consideration, disregarding the common chains of command.

2.1.8 Resolution and Right to Appeal

It is in the interests of both the complainant and Caritas Denmark to ensure that any complaint is resolved in a satisfactory manner. Should the complainant not feel satisfied with the outcome despite having had the opportunity to request further clarification or feedback, they can submit a formal appeal directly to Caritas Denmark's Board Chairman. This can be done in writing, by letter or e-mail, to the following addresses:

Caritas Denmark Attn. Board Chairman Christa Bonde Gammel Kongevej 15, 3. 1610 Copenhagen V c.bonde@mail.dk

Mark: Confidential

The Board Chairman will then assess if the CCC has abided to the policy and procedures outlined in this document, and if the complaint has been treated fairly. Furthermore, the Board Chairman has the mandate to assess the level of insight into the complaint handling circumstances that a complainant wishing to appeal can be granted.

2.1.9 Sanctions for False Accusations

False accusations against an individual or organisation can have severe implications for those involved. The accused might have been humiliated, have had their reputation tarnished, a project might have been suspended, activities delayed etc. Hence, in case of deliberate false accusations, sanctioning of the complainant would be the fair consequence. In practice, this might be difficult to implement depending on the specific situation. The accused can consider to resort to court, in which case Caritas Denmark will consider financial support, depending on the specific case in question.

If the complainant is a staff member of Caritas Denmark, the management will decide an appropriate reprimand towards the complainant and assess the need for compensation to the falsely accused

individual or organisation. In case the complainant is a staff member of a partner organisation, Caritas Denmark will recommend the partner organisation to take similar action.

Nevertheless, most likely a deliberate false accusation will be made by an anonymous complainant, fearing repercussions. In such cases, sanctioning is not possible. This fact is taken into consideration when processing anonymous complaints.

2.1.10 Handling of complaint withdrawal

Complainants willing to withdraw a complaint already submitted to the CCC and being processed by it, are allowed to do so. However, they will have to justify the reason of the withdrawal. The CCC members will then assess if there is a need to investigate further or if the action plan still has to be rolled out.

2.2 Partner Complaints Handling Mechanisms

In line with our *Charter 4 Change* commitment, Caritas Denmark focusses on “*Localisation of Aid*” in our partnership approach. Hence, to Caritas Denmark the principle of “*Accompaniment*” is key in how we work with our partners. The Caritas Partnership Guiding Principles states that:

“Authentic partnership means a long-term commitment to agreed objectives based on shared values, strategies and information. It is characterised by honest feedback and joint planning, accompaniment, transparency and accountability on both sides, and a genuine openness and sensitivity to the other’s needs, feelings, expertise, experience and wisdom. [...] Partnership aims to have a positive impact on the lives of the people we serve”.

The role of Caritas Denmark staff is to accompany consequently and support the local partners to implement high quality interventions in line with international standards and general good practice in order for them to deliver the best possible service to the people in need. This entails ensuring that partners have appropriate policies, systems and procedures in place to enable such intervention, bringing their attention to weaknesses and guiding them towards improvements.

In some cases, depending on the project set-up and context, it might be most appropriate for the partner to develop their complaints handling mechanism in consortia with other local actors, such as UNHCR or sector groups, so as not to confuse the beneficiaries with too many complaints options. In such cases, Caritas Denmark will accompany partners to ensure that the consortia complaints handling mechanism reflects the principles outlined in the Caritas Denmark complaint policy and international standards recognised such as the Core Humanitarian Standards (CHS).

2.2.1 Awareness and Acknowledgement

The first step for the Accountability Coordinator in ensuring that partner organisations have a culture in which complaints are taken seriously, is mapping the systems in place. For this purpose, Caritas Denmark has developed a Partner Complaints Handling Mechanism Checklist. The second step is raising awareness within the partner organisation to fully understand the need to develop or improve their complaints handling mechanism and acknowledge their obligation to manage complaints in a timely, fair and appropriate manner. As this process depends upon the individual partner and their organisational culture, it is the responsibility of the Accountability Coordinator, in consultation with the responsible Programme Coordinator, to assess how best they can accompany their partners on this path.

2.2.2 Mentoring and Monitoring

All partners are expected to have in place a complaint handling mechanism reflecting the principles of Caritas Denmark’s Complaints Handling Policy described in this document. This includes a written description of their complaints handling policy and procedures, which must be in accordance with the Core Humanitarian Standards (for all humanitarian partners) and the Caritas Internationalis Management Standards (for all Caritas partners). The existence and quality of complaint handling mechanisms consequently are key in the annual overall assessment of the continued partnership potential.

It is the responsibility of Caritas Denmark to guide the partners towards this achievement. Therefore, partners who do not yet have written description of their complaints handling policy and procedures must be guided in developing such and partners with policies and procedures not in line with these standards must be guided in how to make the necessary improvements. By the end of 2017, all humanitarian partners have received a Guiding List of Content for a Complaint Handling Policy based on which they can initiate such process. Partners are encouraged to share their drafts with Caritas Denmark, who, based on the Partner Complaint Handling Mechanism Checklist, will quality assure the documents and mentor the partners onwards.

The Accountability Coordinator or the Country Programme Coordinator will monitor the application of procedures via partner visits, skype meeting, correspondence, etc. This includes ensuring that beneficiaries are aware of their complaints options and of partners’ commitment on prevention of sexual exploitation and abuse. Through the annual progress reports, Caritas Denmark will monitor that the partners regularly report on the complaints received and the extent to which these were handled in line with the procedures described in the complaints handling policy of the individual partner.

2.3 Recording and Reporting

Partners should be recommended by the Programme Coordinators to include reporting on the below parameters as part of their *quarterly progress reports*, which makes the annual complaints reporting easier to handle. Either way, the *annual complaints reporting* should be considered a reporting obligation and besides the below parameters involve learning drawn from the complaints, examples of operational or policy changes based on this learning, and the annual average response time. The reporting can be in the format preferred by the partner, either annexed to the progress reports or separately.

<u>Number of complaints received, divided into:</u>	<ul style="list-style-type: none"> • Nature of complaints (eg. fraud, sensitive, operational) • Male vs. female complainants • Channels through which complaints were received • Representing the beneficiaries and from other sources. • Status (eg. still in process vs. closed) • Referred to other stakeholders
---	---

The scope of complaints can be limited to the Caritas Denmark funded programmes or comprise all complaints received by the partner organisation, also covering programmes funded by other donors if this more convenient for the partner organisation.

In case a partner receives a complaint that requires the urgent attention and/or action of Caritas Denmark, such should be reported immediately to the Caritas Denmark Accountability/Programme Coordinator or management. This applies for all complaints of fraud related or sensitive nature that relates to the geographical locations of the Caritas Denmark funded programmes and offices involved in the implementation.

In June every year, the International Team Leader (and CCC members) will compile a list of all complaints received and reported by the partner organisations during the previous year. The CCC will meet and go through this list for their information. Subsequently, the CCC Secretary will consolidate this compilation with the complaints submitted during the year directly to Caritas Denmark and assess what can and should be included in a public annual report published on the Caritas Denmark website in English. This will serve as information on Caritas Denmark's complaints handling for all interested stakeholders and as a summary record for our own use and reflection. The level of information disclosed will depend upon the nature of the individual complaints and protection of the implicated parties will be prioritised above transparency.

2.4 Learning and Improving

The Caritas Denmark Annual Complaints Record Report will be utilised internally as the basis for discussion during a weekly staff meeting in April every year. The staff will go through the complaints one by one and reflect upon what we have learned from this particular complaint and how we can improve our work based on this lesson. At this stage, complaints reported from partners through the progress report might already have been the subject of similar reflections in the International Team. Similarly, learning from complaints received by the CCC might also have identified weaknesses and inspired change during the year. Nevertheless, the staff meeting learning discussion provides a systematic means for making sure that all learning is extracted from the complaints and all possible improvements are implemented.

Finally, it is Caritas Denmark's aspiration to learn from our complaints handling mechanism through each complaint we receive in order to constantly improve our policy and procedures to live up to our responsibility to be answerable and protect all involved stakeholders and to ensure that we with our partners provide the best possible service and care to the beneficiaries.

Annexes: Complaints Classification Template,
 Guiding List of Content for a Complaint Handling Policy
 Partner Complaints Handling Mechanism Checklist