ADRA Denmark Complaints Report 2019

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About the report

ADRA Denmark recognises the importance and value of listening and responding to concerns and complaints. The purpose of our complaints handling procedure is to ensure that the organisation is fully accountable to all of its stakeholders, enabling them to raise complaints and concerns about the work and operations of ADRA Denmark as stipulated in ADRA Denmark's Complaints Handling Procedure (2018). We are committed to effective complaints handling mechanisms that reflect the needs, expectations and rights of the complainants and address complaints in an efficient, fair and timely manner. The procedure promotes safety, dignity, respect for all stakeholders involved with ADRA Denmark and our programmes. We align our efforts also with ADRA International's Complaints and Response Mechanism (March 2016), with the global ADRA Protection Policy (revised 2018) and ADRA Denmark's Anti-corruption and Whistle-blowing policy (April 2018). This report reflects on complaints and concerns received through the mechanism during 2019. We aim to be accountable and transparent to all our stakeholders by sharing complaints received, our action taken and the lessons we learned from it for our work.

Principles of complaints mechanism

Driven by our four key organisational values, namely equality, dignity, justice, and social responsibility, ADRA's approach to welcoming and handling complaints is motivated by the following principles:

- Accessibility including ensuring that mechanisms are culturally relevant, in an appropriate location and in a language understandable by all;
- Participation including community input to design of complaints mechanisms;
- Confidentiality where appropriate, protecting identity of complainants and concerned staff and handling sensitive issues with due privacy;
- Safety seeking to ensure that no one is put at risk due to making a complaint;
- Transparency being open about how we handle complaints, what can be complained about, and changes that have been made as a result of complaints;
- Professionalism including acting with a high level of respect and common sense, and handling complaints in a timely manner.

Executive Summary and Highlights

In 2019, ADRA Denmark has received four non-sensitive complaints and two sensitive complaints, which have all been resolved in a timely manner. Further, ADRA Denmark has strengthened the organisation's efforts and commitments towards accountability and complaints handling procedures through various channels in 2019.

In May 2019, ADRA Denmark undertook the accreditation and licensing process required by ADRA International for all ADRA offices. The organisation's capacity was assessed compared to several quality standards needed to be part of the international ADRA network. The standards are related to the Core Humanitarian Standard on Quality and Accountability. ADRA Denmark received accreditation in September 2019. Currently the implementing partners are undergoing the same process to receive the ADRA accreditation. Additionally, ADRA Denmark started the verification process for the Core Humanitarian Standard with an audit in 2019.

Lastly, ADRA Denmark has hired a MEAL Advisor in October 2019, who will be also focusing on rolling out the complaint mechanism procedure with the implementing partners in the project countries.

Complaints received in 2019

In 2019, ADRA Denmark has received a total of six complaints in writing as well as over the phone. Four of those have been classified as non-sensitive, two as sensitive complaints according to the procedure. However, only the non-sensitive complaints are directly targeted to ADRA Denmark, the sensitive complaints are related to one of the implementing offices. As ADRA Denmark is implementing via partners in the project countries, the partners also receive complaints and address those on local level. If needed, ADRA Denmark is involved in the partner's complaints mechanism e.g. through supporting investigations.

In the following, each complaint is reflected with what has happened, how ADRA Denmark reacted and what we learned from the complaint for our work or projects.

Non-Sensitive Complaints

Complaint 2019-1, August 2019: Worry about focus of Hjælpeaktion in schools

Situation	After one of ADRA's school collections (Hjælpeaktion), a parent voiced concern that the focus of
	the collection is shifting from humanity and charity to competition as the class collecting the most
	funds was awarded with a small price in form of candy. Further, the parent stated that all pupils
	should be awarded to respect everyone's effort in the collection.
Reaction	The complaint was recorded as a non-sensitive complaint and a response has been directly sent
	to the complainer.
Learning	Discuss with the collection teams how the collection can be done non-competitive but still fun
	for pupils to participate in.

Complaint 2019-2, August 2019: Suspicion for missing approval for collection

Situation	After a school collection, a complaint was received that the collection was not recorded and approved through indsamlingsnaevnet.dk.
Reaction	The complaint was recorded as a non-sensitive complaint and a response has been directly sent to the complainer.
Learning	Ensure that during all collections a printed copy of the approval from indsamlingsnaevnet.dk is available.

Complaint 2019-3, September 2019: Suspicion for missing approval for collection

Situation	After a collection, a complaint was received from an association that ADRA was suspected to
	collect without approval from indsamlingsnaevnet.dk. ADRA's approval was not to be found online
	and thus the association will report ADRA. The complaining association was upset as they have
	also been collecting at the same day with approval.

Reaction	The complaint was recorded as a non-sensitive complaint and ADRA reached out to the
	complaining association. The correct information, including the fundraising permit, was shared.
	Follow up questions were clarified, and the complainant was satisfied with the response received.
Learning	Ensure that during all collections a printed copy of the approval from indsamlingsnaevnet.dk is
	available.

Complaint 2019-4, September 2019: Disagreement with end of contract and renumeration received

Situation	An implementing partner has received a whistle-blower's complaint after ending the contract of
	a local project staff under one of ADRA Denmark's projects. According to the complainant, the
	staff has held an acting position, which he/she was not reimbursed for. The partner's management
	has addressed the complaint by offering a compensation based on the evidence given. However,
	the complainant was not satisfied with the action taken by the partner's office and thus has issued
	a written complaint to ADRA Denmark's management to address the situation.
Reaction	The complaint was classified as non-sensitive and discussed with the management of the
	implementing partner via video conference as well as shortly after during a visit to the project
	country.
Learning	Emphasise the importance of having adequate referral systems in place in our partner offices.

Sensitive Complaints

Complaint 2019-5, June 2019: Allegation of sexual exploitation in a partner office

Situation	ADRA International's complaint officer has received allegations of sexual exploitation in exchange for money, employment and other services towards three former staff in a partner's office. All three staff were not employed anymore, when the complaint was received. Three separate cases for investigation were opened.
Reaction	The complaint was classified as sensitive complaint and was addressed according to the ADRA network's complaint handling procedure. The complaint was handled with urgency and confidentiality. As immediate reaction, a team was set up to establish an administrative safeguarding investigation. Interviews and evidence were collected by an impartial investigation team in the partner office. ADRA Denmark participated in the investigation committee overseeing the investigation.
	The investigation showed that in one of the three cases the allegations of sexual exploitation were not founded due to evidence that clears the individual of this complaint. In the two other cases the investigation found that the allegations of sexual exploitation were not founded due to insufficient and unclear evidence. However, the partner's Code of Conduct and protection policy was violated in one case. As consequence, the person was marked as ineligible for rehire for the next five years in a position with staff responsibility and as required to undergo training in people management before being considered for future employment.
	Additionally, the investigation showed that all required policies, both on local and network level, were known and signed by all staff in the partner office. Recommendations and other observations

	were shared with the management team of the partner's office to strengthen accountability. Further trainings were conducted on SEA and complaints mechanisms in the partner's office.
Learning	Implementing partners should include a training/awareness session for staff on complaints
	mechanisms (focused on both beneficiaries and staff complaints) as a mandatory component in
	project kick-off meetings. During monitoring visits, ADRA Denmark should conduct spot checks
	that staff has signed the required policies and that they are kept as a file.

Complaint 2019-6, July 2019: Allegation of mismanagement of staff and funds

Situation	During an annual meeting in the ADRA network, an ADRA Denmark staff was informed about a deteriorating work environment in one of the implementing partners' offices, who then recommended to approach the local management and board directly. The concerns were followed up during a partner visit directly with the partner's Board chair. Four months later, a whistleblowing email was received by ADRA Denmark. Allegations were focusing on questionable management decisions, misuse of funds, HR issues and staff leaving the organisation.
Reaction	The whistleblowing email was shared confidentially with the partner's office for them to respond. Following oral and written communication, a formal and on-site investigation by an independent external team was undertaken in collaboration with two other ADRA offices and the regional office. The outcome showed that the staff in the partner's office was not able to voice concerns without fearing for their positions and indicated nepotism and possible fraud. Recommendations have not been followed as expected by the partner office. As a consequence, ADRA Denmark has decided that the continuation of the partnership is not possible. A Forensic Audit is being conducted to further conclude on the matter.
Learning	There is a need for ADRA Denmark and the ADRA network to jointly identify ways to prevent such situations including how to strengthen leadership, management and accountability within the ADRA network.

Focus areas for 2020

For the coming year 2020, ADRA Denmark is going to focus on strengthening and improving the following areas:

- 1. Supporting partners in rolling out their own complaints handling mechanisms on beneficiary level.
- 2. Supporting partners in developing the culture for using complaints as lessons learned on organisational level.
- 3. Supporting partners in documenting and analysing complaints received in a structured way.
- 4. Improving ADRA Denmark's annual reporting on complaints received both on project level by introducing indicators for complaints mechanisms
- 5. Strengthening ADRA Denmark's annual reporting on the process of complaints mechanisms on partner level
- 6. Advocate for focus on strengthened leadership, management and accountability within the ADRA network.