



The right to complain and the duty to respond

Danmission's Whistleblowing and Complaints Handling Mechanism Guidelines

Introduction

These guidelines should be read in conjunction with Danmission's Safeguarding Policy, Financial Integrity and Ethics Policy, Donation and Grant Acceptance Policy & Child Protection Policy.

The guidelines reflect the CHS Alliances', ACT Alliances' and Transparency International's principles for effective complaints mechanisms and gives direction on how to complain and how the complaint should be handled.

These guidelines provide an overview of the key steps and issues Danmission should consider when responding to serious complaints including corruption, discrimination, sexual exploitation, harassment and abuse.

The principles of these guidelines can be equally used and adapted for handling all kinds of complaints received. They summarize the 'who, what, when, why, where and how' of managing and investigating complaints and reporting on findings. They also identify potential difficulties and offer practical responses and solutions. These guidelines do not address every possible scenario which could arise during an actual investigation. Rather the guidelines give tools and structure to secure a fair and transparent complaints process. When in doubt of a response please refer to the CHS alliance guidelines on complaints handling.

All complaints are handled in confidentiality by the designated Complaints Handling Focal Point at Danmission headquarters. In Danmission we take the complaints handling system very seriously, and we will not accept or tolerate false accusations. A staff member who purposely makes false accusations about another staff member, will be subject to disciplinary action (warning/dismissal).

The guidelines are available in a shortened version in the 'Short Information Note', see annex 1, which should be available to all stakeholders in Danmission projects outside Denmark.

All questions about the complaints handling system can be raised with the designated Complaints Handling Focal Point, see website.

Definitions:

Complaint: A formal notice to Danmission on breaches of relevant policies.

Complainant: The person formally making the complaint to the Danmission Complaints Mechanism.

Complainee: The subject of the complaint accused of breaching relevant policies.

Complaints Handling Team: The Danmission Complaints Handling Focal Point and Senior Advisor HR.

Complaints Committee: The committee responsible for handling the complaint. The committee must consist of a Complaints Handler responsible for the ongoing progress

of the complaints case, a country representative responsible for carrying out local investigations, a management representative responsible ensuring ongoing management support to and oversight of the investigation.

How to Submit a Complaint?

If Danmission staff, Danmission volunteers, interns, external consultants connected to Danmission's work, employees in partner organisations or communities supported by Danmission have substantiated suspicion or encounters of corruption, terror-financing, conflicts of interest, discrimination, sexual exploitation, harassment or abuse, they are obliged to report this to Danmission through a complaint.

All complaints must be submitted through the complaints handling system, which is managed by a designated Complaints Handling Team consisting of the Danmission Complaints Handling Focal Point, see website, and Danmission's x.

Danmission has three primary ways of filing a complaint.

1. By filling out the complaint's formula on the Danmission [website](#).
2. By writing an email to complaints-handling@danmission.dk
 - a. The email should contain the information requested in the complaint's formula.
3. By informing Danmission's Regional Director on the suspicion
 - a. In this case, the Regional Director will be responsible for carrying the complaint forward to the Complaints Handling Focal Point.

Danmission's partners are required to have local complaints handling mechanisms, which can also be used to file complaints – this complaint will then be sent to the Danmission complaints handling mechanism by the local partner.

Areas of complaints

The scope of the complaints-handling system is as follows:

- Behaviour of Danmission staff or staff supported by Danmission donations
- Behaviour of Danmission volunteers
- Behaviour of Danmission's partners' staff
- Behaviour of external consultants engaged by Danmission

Complaints should be related to violations of (inter)national law or the Danmission policies and codes of conduct related to:

- Financial Integrity and Ethics
- Safeguarding
- Donation and Grant Acceptances
- Child Protection
- Ethical Code of Conduct

All internal employment conditions like salary level, performance evaluations, working area etc. will not be handled within this system. These types of complaints will be dealt with via the relevant channels in the organisation.

If the complaint filed falls outside the scope of the mechanism, the person who complained will simply be informed about this.

Anonymous complaints

Danmission does not accept anonymous complaints. For safety reasons it is possible to complain through someone else, thus staying anonymous to the Complaints Handling Team but being known to the “mediator”. Thus, making it possible for the Complaints Handling Team to get in touch with the complainant.

Complaints brought by someone other than the affected person

A complaint can be made by anyone who is concerned that a staff member has breached policies including engaged in sexual exploitation or abuse of a person of concern. The complaint does not have to be made by the affected person. Indeed, in some cases the affected person will not agree to provide testimony or may want the investigation to be discontinued. While these wishes should be considered, particularly when there is risk of physical, emotional or social harm, the affected person does not ‘own’ the allegation but is a witness with same rights as other witnesses.

Ultimately, the Complaints Committee decides whether and how to proceed, considering issues such as the wishes of the affected, the potential for future abuse and harm, the reputation of Danmission, Danmission’s responsibility to protect and create a safe and abuse-free environment, national law and the ability of the investigators to reach a conclusion on the available evidence.

Overall principles for complaints handling

- **Safety** - the complaint mechanism will assess potential dangers and risks to all parties and incorporate ways to prevent injury and harm.
- **Impartiality** – the investigation will be conducted in a fair and equitable manner
- **Confidentiality** – this is an ethical principle that restricts access to and dissemination of information but also a principle which follows the EU general data protection regulation. It may entail that you are not able to share certain information with the complainant.
 - Divulging confidential information to persons who are not authorised to receive it may amount to misconduct and lead to sanctions.
- **Transparency** – The complaints mechanism is based on a principle of transparency, is freely available to communities and contains clear procedures for handling complaints to ensure transparency in the handling of the complaint.
 - However, the complaint should not be referred or disclosed to any person accused or potentially involved in the alleged malpractice without the explicit consent of the complainant, unless required by law.

- **Timeliness and thoroughness** – We deal with complaints in a timely manner but at the same time strive at thoroughness.
- **Legality** – All investigations are conducted in such a way that it is legally enforceable, demonstrating fairness and reason, and based on clear and convincing evidence.
- **Cultural awareness** – Cultural sensitivities will be considered and factored into the investigation process.
- **Reporting and learning** – The outcomes of the investigation will be shared with relevant parties. Learnings from the complaints and investigations will be integrated into programs, policies and practices. With due consideration of privacy, confidentiality and safety.

The Complainant should:

- Receive confirmation of receipt of complaint and information on how Danmission will investigate the complaint and the decisions made based on the complaint
- Receive timely medical attention if /he is the survivor of abuse and requires medical attention
- **Once the investigation begins, at no stage during the investigation should the complainant be informed about the status of the investigation**
- Be informed on a need to know basis about the outcome of the investigation, they have no automatic 'right' to know the outcome. The identities or the evidence of other witnesses should never be disclosed.

The Complainee Should be:

- Treated the same as any other witness
- Informed of the process and potential consequences of the investigation and any avenues of appeal
- Have the allegation(s) explained to her/him during the interview, without divulging the identity of the complainant or witnesses
- Allowed, in her/his own words, to address every piece of evidence in support of the allegation(s) and to raise new evidence in support of her/his account
- Given a clear breakdown of why the allegation equates to a breach of Danmission policies or principles
- Advised that the investigation may lead to disciplinary and/or law enforcement action, if relevant
- Advised that it is best for her/him to cooperate as it is her/his opportunity to present all evidence in her/his favour
- Allowed to withhold documents from the investigators if they were created in their private capacity using their own equipment
- Be informed, in writing (when possible), of the outcome of the investigation

The Complainee Should NOT be:

- Told the name of the complainant even if they persist.

- If they persist, reiterate the importance of confidentiality for the process
- Told the sources of evidence during the interview
- Informed if the allegation has been referred to the national authorities for criminal prosecution as further action will be taken by the national prosecuting authority.
- **Again, the names of witnesses or complainant should not be disclosed no matter what the outcome of the investigation.**

Important regarding confidentiality

In order to ensure confidentiality in complaints handling, and to protect witnesses, the following measures should be taken when maintaining the case log:

- Develop predetermined codes for all external communication regarding:
 - the complainant, e.g. witness A
 - survivor(s) if not the complainant, e.g. victim
 - complaine, e.g. subject A
 - other witnesses, e.g. witness b
- All records must be saved in the case folder on the Complaints Handling SharePoint site.
- The Complaints Committee should not share the case log or other documentation with anyone outside the committee

Complaints Handling Process

Step 1: Receiving a complaint

Upon receiving the complaint, the Complaints Handling Focal Point acknowledges the receipt of the complaint to the complainant and creates a folder on the 'Complaints-Handling'-SharePoint and a Case Log, see Annex 2, for the complaint providing the case basics:

- Complainant
- Date for reception of complaint
- Subject
- Complaine(s)

Step 2: Deciding on whether to investigate

All complaints need to be reviewed and addressed by both members of the Complaints Handling Team, but not all will require a formal investigation process.

The Complaints Handling Team will need to determine:

- Does this concern constitute a potential breach of organizational policy?
- Does this constitute an illegal act?
 - If so, see below guidelines for 'Reporting to authorities'
- Is there an identified victim?
- Is the complaint sensitive or non-sensitive?
- Is further information required to determine either of the above?

- In this case, Danmission may decide to look for further information to provide sufficient information to take forward the complaint. This needs to be done extremely carefully, following the same principles as an investigation.

Danmission usually decides to undertake an investigation when:

- a) there is sufficient information to constitute a complaint and
- b) evidence is required to determine whether or not the complaint can be upheld.

Questions to ask yourself on suspicion of false complaints:

- Is it a false email address?
- Does the complaint support or dispute previous reports?
- Is it a complaint to damage the reputation of the accused?
- What is the motive of the complainant?

Note that at this stage, immediate health and protection concerns regarding those involved should be assessed and dealt with. A more detailed protection risk analysis should also take place when the Complaints Committee is in place.

After deciding, whether to investigate or not, the Complaints Handling Team informs the complainant on the decision. If no, the complainant should be provided with relevant justifications for why the complaint isn't considered within the scope and possible alternative channels to pursue their grievance.

Step 3: Appointing the Complaints Committee

When the decision to investigate has been made a complaints committee is established. An optimal constellation is a committee comprising of an uneven number of participants. As a standard three people on the committee is a minimum requirement. The standard composition is

1. Complaints Handler: A member of the Complaints Handling Team responsible for the ongoing progress of the investigation and compliance with these guidelines.
2. Country Representative: A representative from the specific country, that the complaint is related to. This representative will be responsible for the on-site investigations, dialogue with local stakeholders and ensuring compliance with local cultural norms.
3. Management Representative: A member of Danmission's senior management must be included to ensure the necessary decision making competencies and management support in the investigation.

After constituting the Complaints Committee, a local legal advisor and/or local auditor (if relevant) should be found. The legal advisor and/or auditor is to guide the team on issues relating to local labor laws, criminal laws, etc.

Step 4: Planning the investigation, including risk assessment, and information sharing

A step-by-step plan must be made which includes a process plan describing, whom to involve/interview in the investigation e.g. witnesses, complainant, complainee, etc. The plan must include a risk assessment focusing on both personal safety, issues of organizational safety and safety of evidence.

The plan should be focused on which facts are necessary before reaching conclusions on the complaints' validity and how these facts are best gathered. Based on these, the best approach to establishing these facts should be determined, typical approaches include gathering relevant physical and digital documentation and interviewing witnesses.

The step-by-step plan should reflect relevant timings in which fact-finding tasks should be prioritized first, e.g. are further documentation needed prior to interviewing relevant witnesses.

Please keep in mind that your fact-finding (also called an administrative investigation) can be used in a criminal investigation at a later stage. Avoid causing damage to evidence or influencing witnesses and considering the views and rights of potential defendants.

Investigative audit

If relevant it is possible to evoke an investigative audit in which case an external auditor will collect all relevant evidence instead of the Complaints Committee. An investigative audit is a good and important tool in an investigation process.

Information sharing

Once a plan has been established, relevant parties should be informed on the plan. These include, but is not limited to:

- Danmission Management
- Danmission Board
- Complainant
- Involved donors, if applicable

Internal information

As soon as a decision to investigate a case has been taken, Danmission Management and Board must be informed. The information should be limited to the relevant information for them to understand the potential organisational implications of the case and not contain any confidential information.

Donor information

If the complaint is related to a project funded by an institutional donor with specific clauses on complaints handling, the relevant donor should be informed as soon as Danmission has decided to conduct an investigation.

In addition to informing the donor on the case, the donor should be consulted on the possibility of covering costs related to the case investigation via the project or programme.

For cases referring to Danida a c-file form (Annex 6 to the strategic partnership guidelines) must be filled in. The form and adjoined appendixes are requested sent to the granting department in the Ministry of Foreign Affairs and the respective head of section. All cases of corruption are published on the website of the Ministry of Foreign Affairs very soon after the c-file form is submitted. Consider whether it is relevant to ask the Ministry of Foreign Affairs for anonymity as long as the investigation is ongoing. If the publishing of the case on the Ministries website will compromise personal security, it is possible for the Ministry not to publish the case on their website.

When it comes to reporting cases of sexual exploitation, abuse or harassment please see the Danida guidelines. It is also relevant to talk about a media and communication strategy with the communication department on these types of cases.

For cases involving EU funded projects, refer to the relevant EU guidelines. These guidelines depend on the grant so please consult the controller responsible for the project in Danmission.

Step 5: Gathering Background Material and Documentary Evidence

When Danmission talks about “investigation” in conjunction with complaints handling it is referring to an “administrative”, not criminal investigation. If, however, an investigation is conducted effectively and professionally, it is legally enforceable. Therefore, it is imperative to understand the significance, value and level of professionalism that is required in an investigation process for complaints.

Throughout the investigation, the Complaints Committee will need to consult documents to identify documentary evidence, including evidence from relevant Danmission computers. If needing to secure sensitive documentation, or documentation without relevant staff knowing, the head of Resources and Capacity should be consulted.

Logging and filing documentation

Soft copies of all documentation gathered must be filed in the case folder and a documentation log must be kept giving each document an identifier number.

If any hard copies or physical evidence are gathered, these must be stored in a locked safe or cupboard with limited access.

What is documentary evidence?

Documentary evidence is all information that is relevant to the complaint and that is recorded in some way in physical or digital form. It can include, but is not limited to:

- staff records
- rosters
- diagrams
- handwritten notes
- employment contracts
- project documents
- staffing structure organizational chart
- any correspondence related to the complaint
- annual reports
- audits
- legal documents
- receipts
- ledgers
- financial statements
- E-mails
- telephones

Also, social media posts and photographs can be collected.

Who has relevant documentary evidence and who can access it?

Danmission staff, local partner staff and witnesses will be the most relevant sources of documentation, however local authorities, auditors and other stakeholders can also be important sources of documentation.

If investigators cannot find relevant materials that they can reasonably expect, they should check whether documents have been moved, destroyed or archived and include investigations on who is responsible for this.

When to collect documentary evidence

You should begin collecting documentary evidence as soon as possible in the investigation as it can help guide you about whom to interview and what questions to ask.

How to manage documentary evidence

For every document, it should be possible to establish how it was collected and who provided the document. This is relevant for both physical and electronic documents.

If seizing a computer to avoid the destruction of evidence, make a list of the computer's components, including the make, model and serial number of the monitor, computer, disk drives, cables and speakers. Store the seized computer in a safe and secure location. Only ever log onto or browse the computer with another investigator / or member of the complaints committee present.

What to look for when reviewing documents?

When reviewing the documents, the investigators should be alert to internal inconsistencies and to reference other relevant evidence. It is particularly important to check consistency in names, dates, time of day and addresses.

Typical signs of corruption can be:

- Abnormal cash payments
- Pressure exerted for payments to be made urgently or ahead of schedule
- Payments being made through 3rd party country (e.g. goods or services supplied to country 'A' but payment is being made, usually to shell company in country 'B')
- Abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions
- Private meetings with public contractors or companies hoping to tender for contracts
- Lavish gifts being received
- Individuals never take time off even if ill, or holidays, or insists on dealing with specific contractors him/herself
- Making unexpected or illogical decisions accepting projects or contracts
- Abusing decision process or delegated powers in specific cases
- Avoidance of independent checks on tendering or contracting processes
- Raising barriers around specific roles or departments which are key in the tendering/contracting process
- Bypassing normal procurement procedures
- Invoices being agreed in excess of contract without reasonable cause
- Missing documents or records regarding meetings or decisions

Returning documents after the review

Investigators should return original documents to their owner as soon as possible.

Investigating the complaint – gathering physical evidence and conducting site visits

Site visits are inspections of the place(s) where the alleged incident or its component parts occurred. Site visits are useful, especially at the beginning of the investigation, to determine whether the alleged exploitation or abuse was possible in the manner described and to gather physical evidence relevant to the witnesses' accounts.

Before conducting site visits or searching for evidence, investigators should ensure that they have the relevant authority cf. these guidelines, project / programme agreements and applicable legislation. They should then arrange a time to visit each site and conduct the search in the company of at least one other investigator or an independent observer. After the visit, they should write a file note recording who was present, in what condition they found the site, what objects (if any) they gathered there

and the date and time of the visit. If possible, they should attach photographs or sketches of the site or relevant objects.

Validating evidence

As information is collected, it should be evaluated for consistency and reliability. Investigators determine consistency by comparing each new piece of evidence to each piece of existing evidence. If there are inconsistencies, the investigators seek further evidence or make a judgement as to which source is more reliable. There are no particular rules about reliability in administrative investigations. However, investigators should avoid relying solely on hearsay or testimony from people who are obviously biased.

Medical evidence

Medical evidence is rarely used in administrative investigations as it will rarely help establish whether exploitation or abuse has occurred. It is more common for the initial contact person to note any obvious physical signs of abuse when they meet the witness for the first time and to record these in a file. Only, if it is absolutely necessary, the investigators may ask the witness whether they have seen a doctor or other medical personnel and seek permission from the witness to talk to that medical officer. Investigators should never speak to a medical officer without the permission of the witness.

Step 6: Interviewing witnesses

The Complaints Committee conducts the witness interviews. Interviews are never conducted one-on-one but always with two investigators present.

No witness has an automatic right to a third party, lawyer or otherwise, accompanying them at the interview. It is not advisable to have a third party at the interview. The third party can only attend if Danmission consents or if there are specific national legal rights specifying differently. It is important to highlight in the request for an interview, that the interview is not part of a criminal case, but an administrative case by Danmission.

Consider whom to interview – keep the interview list to the most essential people. It is good practice to interview witnesses in the following order:

1. Complainant
2. Victims, if different from the complainant
3. Other witness
4. Complainee

It is useful for investigators to do a profile of each witness in advance of interviews to identify their special needs and to ensure modification of interviewing techniques to suit the individual. Consider where to conduct the interview. Find a place where the interviewee will feel safe and the interview can remain confidential.

It may be necessary to use an interpreter during the interview. Make sure that the interpreter does not have any affiliations to the person being interviewed or to the organization. Also consider clan relations and other affiliations which could compromise the interview.

If interviewing children, please consider whether a trained child expert should conduct the interview instead of the investigator as an interview can be a traumatic experience for a child who is to share sensitive information. Always consider whether the child needs follow-up sessions with a psychologist depending on the nature of the interview.

If any of the interviews results in further documentary evidence or needs hereof, the Complaints Committee should repeat step 4 as presented above.

How to interview a witness

When a witness arrives (the complainant, SoC, or other witnesses), after thanking them for attending the interview, be courteous and provide the following opening information:

Introductions

Introduce investigators, experts and interpreters (make sure that the witness has been introduced to everyone in the room and their roles as the witness may feel nervous or vulnerable).

Honesty and Accuracy

Inform Danmission staff that they have a duty to respond and an obligation to tell the truth. For witnesses who are non-Danmission staff, simply thank them for their time and explain it is important for them to be accurate.

Confidentiality

Inform Danmission staff that for the purpose of confidentiality, they must refrain from communicating with other persons interviewed in this investigation process. Explain that as a staff witness, breaching confidentiality can result in disciplinary measures. Non-staff witnesses should also be aware of the need for confidentiality (of course, compliance cannot be enforced, instead, emphasis should be made on ensuring a fair investigation)

Purpose of notetaking

Explain who will be taking notes (if there are two investigators, it is best if one leads on questioning and one focuses on taking detailed notes) and that the purpose of taking notes is for accuracy. Explain that at the end of the interview, the witness will be provided with a verbal summary of the interview, and they will be given the opportunity to read the content of the notes and to sign that they agree with the record. Note the date, start and end time of the interview on the statement. Also note whether the interview is face-to-face or by other means.

If you would like to record the interview this can only be done with the permission of the interviewee and cannot be shared outside of the complaints committee. You should always specify the use of the recording to the interviewee and do this on tape.

Acceptable to state when answer is not known

Clarify to the witness that it is ok when they genuinely cannot remember a particular piece of information or do not know the answer.

Right to ask for a short break

Tell the witness where the bathroom facilities are. Offer them water/tea/coffee and explain they can ask for a short break if they need it. Follow local traditions for hospitality.

Step 7: Write investigation report and take action

When steps 5 and 6 have been concluded a report must be written and submitted to Danmission management and board.

The report will follow the beneath table of content:

- Table of contents
- Executive summary
- Introduction and preliminary remarks
- Methodology
- Investigative findings
- Conclusions
- Management implications report
- Possible actions and sanctions
- Annexes

i. Executive summary

The Executive summary provides the reader with a concise overview of the investigation from the time Danmission received the complaint until the writing of the report.

ii. Introduction

The Introduction contains:

- the name/s or case reference number of SoC/s
- date of the report
- information about the nature of the complaint and references to the policies and/or codes of conduct allegedly breached
- information about the scope of the investigation (number of complainants, witnesses, SOC's, etc)
- brief contextual information (e.g. country, region, city, neighbourhood etc)

iii. Methodology

The Methodology sets out:

- the process used during the investigation
- the evidence required / collected
- the interviews conducted
- any impediments to the investigation (i.e. lack of cooperation or unwillingness by any witness to be interviewed)

iv. Investigative findings

The Investigative findings summarise the evidence relevant to each alleged complaint; they will be used to draw conclusions.

v. Conclusions

The conclusions and recommendations states whether or not the evidence supports the complaint as alleged. It is important that the conclusions are clearly stated for each alleged complaint.

vi. Management implication report (MIR)

Finally, investigators may decide to make other recommendations regarding training, supervision, or organizational policies. The MIR will be especially relevant if the investigation findings conclude that the organisation's practices are substandard with respect to protecting people of concern from sexual exploitation and harassment. The MIR should also record any concerns about possible reprisals against witnesses or other participants.

vii. Possible actions and sanctions

If an allegation is substantiated, when considering disciplinary measures, Danmission management must follow relevant laws. In some countries there is a legal obligation to report cases of child abuse or sexual assault in others it is voluntary.

The report must include the Complaints Committees recommended actions and sanctions as a result of their conclusions. Possible actions to be taken and sanctions to be imposed must consider the following points:

- a) The specific context of the case
- b) The level of fraud and corruption or misuse of funds and serious irregularities in question; and
- c) The will, determination and result of efforts on behalf of partners involved to rectify evident misuse of funds and assets.

See Annex 3 for examples of sanctions related to different types of breaches

Danmission's Management Team must decide on the applicable actions and sanctions based on the investigative findings and recommendation from the Complaints Committee.

Step 8: Informing stakeholders on conclusions and actions

Following Danmission's Management Teams decision on relevant actions and sanctions relevant stakeholders are informed on the conclusions of the investigation and the actions and sanctions decided by Danmission's Management Team. Relevant stakeholders include, but is not limited to:

- The complainant
- The victim
- The complainee
- Donor, if relevant

The information should also include a call for appeals within 30 days of receipt of outcome of the investigation.

Reasons for disagreeing may include:

- witnesses that they thinks could have supported or refused the allegations were not interviewed by the investigators;
- some important parts of the complaint were not investigated;
- more evidence was available but not gathered;
- the organisation has not done enough to prevent the same thing from happening again.

Appeals should not be handled by the Complaints Committee, but by an independent appeals committee consisting of:

- Danmission's General Secretary
- Danmission's Chairman
- A relevant country representative

The appeals committee must handle received appeals within 30 days of receipt of the individual appeals. The appeals committee can decide to:

1. Uphold the actions taken and sanctions imposed;
2. or initiate a new investigation with a new Complaints Committee going through steps 4-7 again.

Step 9: Follow Up

A timeline of following up on actions taken and sanctions imposed should be outlined. The follow up should at least include collection of evidence that the corrective actions have been taken (e.g. photos or documents, a record of resolution, an agreement with the complainant, a confirmation from the complainant).

Reporting to relevant authorities

At any point in a complaints case, Danmission may determine, that the case constitutes a potential criminal case, that requires relevant authorities to conduct a criminal investigation and potential trial. Whenever this situation occurs, the administrative investigation should be stopped immediately and below process adhered to.

Step 1: Case brief + recommendation to Danmission Management

The Complaints Committee must provide Danmission Management with a case brief, which provides the following information:

- Brief summary of the case
- Reason for potential criminal case
- Relevant authorities the case will be referred to

Step 2: Notifying relevant authorities

Following the decision to notify relevant authorities, the Complaints Committee gathers all relevant documentation and the case log with all relevant details, and shares these with the authorities as part of the notification.

Step 3: Ongoing collaboration with relevant authorities

After local authorities have taken over a case, Danmission's investigation is formally closed. Instead, all Danmission staff are required to collaborate with relevant authorities.

The Complaints Committee will be responsible for coordinating with relevant authorities and ensure ongoing logging in the case log of all relevant interactions with relevant authorities.

Compliance Monitoring

Compliance monitoring is vital to determine whether the complaints mechanism is in line with the principles defined and assesses the level of effectiveness and efficiency of the complaint mechanism. It is a constant process of proper reviews and amendments and offers an opportunity to discover deficiencies in a timely manner and correct them accordingly. Reports provide valuable information for feedback reports to the organisation's management, communities and other stakeholders.

Danmission's compliance monitoring of the Complaints Mechanism is based on two actions: Bi-annual internal reporting and a public Annual Report

Bi-annual Internal Reporting

In order to secure management monitoring of the Complaints Mechanism, the Complaints Handling Team provides Danmission's Head of Finance and Head of Resources and Capacity with a bi-annual status.

The status can either be a written status report or a status meeting. Either way, the status must include:

1. Number of active cases
2. Number of cases closed
3. The status for each active case:
 - a. Current step being implemented
 - b. Current timeline for the case
 - c. Reflections on compliance with Complaints Mechanism Guidelines

Annual Reporting

In line with Danmission's transparency principles, an annual report on the Complaints Mechanism is published on Danmission's website.

The annual report is fully anonymised, so that no individuals or organisations can be identified.

The annual report includes a list of active cases and cases closed in the relevant year, including the following details:

- Country
- Subject of the case
- Case status
 - Ongoing or Closed
- Case Summary