



ADRA Denmark's Complaints Handling Procedure

**Approved by ADRA Denmark Board December 2017
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ADRA Denmark recognises the importance and value of listening and responding to concerns and complaints. ADRA Denmark is committed to an effective complaints handling procedure that reflects the needs, expectations and rights of complainants and provides the mechanisms for complaints to be addressed in an efficient, fair and timely manner. This procedure complies with ADRA International's Complaints and Response Mechanism paper (March 2016), ADRA Denmark's Anti-corruption Policy (2021), and ADRA Denmark's Whistleblowing Policy (2021).

Purpose

The purpose of these procedures is to ensure 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. This procedure will enable the investigation of complaints made about ADRA Denmark, ADRA Denmark's partners, or ADRA Denmark's programmes. This procedure promotes the safety, dignity and respect for all stakeholders involved with ADRA Denmark and our programmes. The mechanisms detailed within this paper will enable all stakeholders to disclose any unethical conduct they become aware of and will allow ADRA Denmark the opportunity to rectify its mistakes.

Principles for complaints mechanisms

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.

Implementation of complaints handling procedures

ADRA Denmark's Cooperation Committee (*Samarbejdsudvalget*) is responsible for the implementation of these procedures and for handling any complaints brought against ADRA Denmark. The leader of the committee ensures that all processes and procedures are undertaken in a timely manner.

ADRA Denmark's Programme Team provides guidance and support to staff, volunteers and partners regarding the implementation of these procedures.

The chairman of the ADRA Denmark Board will act as the Board Complaints Officer. S/he will provide advice and support to the Complaints Officer and will take responsibility for handling any complaints that are deemed serious enough to warrant engagement by the Board or which involve the Secretary General.

Referrals

Complaints might be made through ADRA Denmark's complaints mechanisms that are actually complaints about other organisations/individuals.

- Complaints about ADRA partner organisations will be shared with the partner concerned. Partnership Agreements underline the expectation on partners to develop complaints mechanisms that conform to this practice. (See Annex 3 for an example of how to set up a complaints mechanism).
- Complaints about other organisations, local authorities, non-ADRA staff. etc. may be referred to the relevant party, subject to decision of senior staff or Country Director, and in compliance with all relevant legal responsibilities. ADRA Denmark will not accept responsibility for how partners or other organisations treat complaints.

ADRA Denmark reserves the right to terminate a partnership or cooperation with another organisation if they do not live up to the standards outlined in this procedure.

What can be complained about?

'Feedback' can be both positive or negative, whereas 'complaints' imply that things may have gone wrong. The key areas of possible complaint may include, but are not limited to, the items below. These issues are defined in more detail in Annex 1.

- Conduct of ADRA Denmark or ADRA's partner staff
- Conduct of other stakeholders involved in project/programme activities
- Fraudulent acts
- Discrimination, for example in beneficiary selection
- The quality of the projects/activities conducted
- Harassment
- Victimisation
- Vilification
- Bullying
- Sexual Exploitation and Abuse
- Child abuse

What is not covered by a complaints mechanism

- ADRA Denmark's staff complaining about each other's behaviour – this will be reported and dealt with as per ADRA Denmark's Anti-Corruption Policy (2021).
- ADRA Denmark's staff complaints about other issues, including work conditions. These will be dealt with through regular communication/management channels.
- General enquiries about ADRA Denmark or our projects/programmes, or requests for information - these are not complaints.
- Contractual disputes e.g. with suppliers will be dealt with as per the articles of the contract.
- Disagreements / disputes with local partner organisations – these should be dealt with as per the relevant Partnership Agreement.

Complaint mechanism versus whistleblowing

A whistleblower raises a concern about danger or illegality that affects others (for example beneficiaries, members of the public, or the organisation). The person blowing the whistle is usually not personally affected by the danger or illegality. Consequently, he/she rarely has a personal interest in the outcome of any investigation into their concern – they are simply trying to alert others.

This is different from a complaint or grievance. When someone complains or raises a grievance, they are saying that they have been personally treated poorly. This poor treatment could for example be a breach of their individual rights and the complainant is seeking justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint and for this reason, is expected to prove their case.

Who can make a complaint?

ADRA Denmark will receive complaints from:

1. Staff and volunteers from ADRA Denmark
2. Staff or volunteers from one of ADRA Denmark's partner organisations
3. Communities or individuals, including children and people living with a disability, involved in any projects/programmes funded by ADRA Denmark
4. Other stakeholders affected by ADRA Denmark funded projects/programmes
5. Donors or other stakeholders in the community
6. The SDA Church and Church Community

How can people make a complaint?

Complaints by an ADRA Denmark staff member that are about workplace issues between two or more staff members should be first addressed by the concerned staff member(s).

People outside of ADRA Denmark should direct complaints to the ADRA Denmark's Coordination Committee who can be reached in the following ways:

- a) Through ADRA Denmark's website (www.adra.dk/make-a-complaint/)
- b) Telephone on +45 4558 7700 and ask for the leader of the Cooperation Committee (*Samarbejdsudvalget*)
- c) Send a letter to ADRA Denmark's Cooperation Committee (*Samarbejdsudvalget*) at
ADRA Denmark
Concordiavej 16
2850 Nærum
Denmark
- d) Through a private and confidential interview with a visiting ADRA Denmark staff member who will document the complaint and forward it immediately to the ADRA Denmark Cooperation Committee (*Samarbejdsudvalget*)
- e) Writing down details of the complaint and giving it to a staff member of the project/programme partner who should immediately forward the complaint to ADRA Denmark and the ADRA Denmark Cooperation Committee (*Samarbejdsudvalget*), (see Annex 2 for an example form).
- f) More Child friendly complaint handling techniques are described in Annex 4.

In case of serious harm or sensitive complaints (relating to sexual misconduct, child safeguarding, or other forms of serious harm including corruption), the case should be reported as follows:

- Within 24 hours to the ADRA Denmark Secretary General (SG) who is the Safeguarding Focal Point or to one of the department directors.
- If you or the person in question are not comfortable reporting to the SG or to one of the department directors, within 24 hours report:
 - Using the ADRA DK homepage (<https://www.adra.dk/make-a-complaint/>).
 - Sensitive complaints will go directly to the Chairman of the Board / Deputy Chairman, or
 - Report to the ADRA International Safeguarding Office (protection@adra.org), or
 - Report anonymously to www.adventist.alertline.com/GCS/welcome

Complaints may come in from multiple entry points. However, they should all still feed into one system in terms of being dealt with clearly and fairly. Even if multiple complaints are received about the same issue, the complaints should be dealt with individually, and a response given to each complainant.

Making safe complaints

ADRA Denmark underscores that sensitive complaints (sexual misconduct, child safeguarding, corruption) will be treated with the strictest confidence. ADRA Denmark stresses that persons making a complaint will not experience discriminatory treatment or retribution by ADRA Denmark as a result of making the complaint. People who make complaints may choose to give their personal information or they may wish to remain anonymous. Staff talking to communities and other stakeholders must make it clear that there is no obligation to provide personal information. However, if people wish to be informed of the outcome of their complaint they will need to provide their contact details.

Timeframe in managing a complaint

ADRA Denmark is committed to, as far as possible, investigating all complaints and drafting a response within one month from the date of receipt of the complaint. Where an investigation requires more time and ADRA Denmark needs to revise the timeframe they will, where possible, involve the parties who have made the complaint.

It is important to monitor the timing of complaints coming in, resolution and response in order to provide a response within the committed to timeframe.

How ADRA Denmark will manage the complaint

All complaints will be taken seriously. The complaint may be dealt with internally or externally, as requires. Where appropriate, ADRA Denmark may seek more information from people who have made the complaint, the partner organisation involved or other stakeholders. If the Cooperation Committee (*Samarbejdsudvalget*) decides it is not possible to resolve the complaint within ADRA Denmark, they may refer the complaint to external processes such as mediation, or statutory complaints handling bodies. Where possible, the person who has made the complaint will be advised in writing of the reasons for this decision, and of the proposed strategy for dealing with the complaint. The overall process will generally be the following:

- a) The Cooperation Committee (*Samarbejdsudvalget*) is to review the materials supporting the complaint on hand and determine the appropriate manner of investigation.

- b) The Cooperation Committee (*Samarbejdsudvalget*) will decide whether they will investigate the misconduct themselves or delegate to another, more appropriate, person.
- c) The Cooperation Committee (*Samarbejdsudvalget*) is to determine what resources are needed for the investigation and secure access to those resources, including the assistance of other employees or external professional help (including lawyers, accountants, forensic analysts or operational experts). Where the complaint involves fraudulent acts, the Cooperation Committee (*Samarbejdsudvalget*) should refer to the procedures outlined in ADRA Denmark's Whistleblowing Policy (2021).
- d) The Cooperation Committee (*Samarbejdsudvalget*) will prepare an Investigation Report and forward to the Secretary General (or the Chairman of the Board if the Secretary General is party to the complaint) and the designated Board Complaints Officer. The Secretary General, in consultation with the Board Complaints Officer, has final responsibility for the resolution of the complaint.
- e) The Secretary General or the Board Complaints Officer will then write to the parties involved to identify the findings of the investigation and notify the resolution to all those involved.
- f) The Secretary General or the Board Complaints Officer will provide a summary of the issue and resolution to the Board.

ADRA Denmark will release an annual Complaints Report to summarise and publicly document the complaints that have been received and addressed during the calendar year. After the annual Complaints Report has been approved by the Cooperation Committee and ADCOM and has been presented to the ADRA DK board of directors it will be uploaded on the ADRA Denmark website where it will remain for a period of five years.

Outcomes of the investigation of the complaint

The outcomes of the investigation of the complaint may be:

- Change in policy and/or procedures;
- Staff training, counselling and/or disciplinary proceedings;
- Reports to relevant authorities and potential legal action if crimes are alleged;
- Further investigation if systemic problems are revealed.

Monitoring

The Complaints Officer and relevant ADRA Denmark staff will continue to monitor the environment under which the complaint occurred until recommendations have been implemented. Feedback on the process will be sought from the parties to identify where any improvements can be made. Complaints will be monitored over time to identify if any trends are emerging that indicate further action is required.

ADRA Partners

ADRA Denmark expects all partners to adopt the same high ethical standards detailed in our Code of Conduct, including a zero tolerance towards corruption. The following clause is present in all Partnerships Agreements.

Beneficiaries must have access to an appropriate known and described mechanism through which they can have their complaints processed.

Continued functioning and monitoring of the complaints mechanisms

It is normal to receive complaints, if there are no complaints received, ADRA Denmark and its partners should ask why this has not happened.

- A review of the number and type of complaints received should be a regular feature of ADRA Denmark's ADCOM meetings, and during meetings with partners.
- Spot checks and questions to check functioning of complaints mechanisms should be included in field monitoring activities.
- All monitoring reports templates (monthly, quarterly and annual reporting) will require that all of ADRA Denmark's partners provide information on the number, nature and response of all complaints received. These provide the basis for further discussion on complaint handling mechanisms and the nature of complaints during ADRA Denmark's monitoring visits.

It is important to remember that communities/target groups are informed about the changes made in reaction to complaints. It is not necessary to share the details of every complaint, but it is important to share information about the changes made in the project as a response to complaints and to continually show that ADRA is listening and responding to complaints.

Annex 1: Definitions

Fraudulent Acts may be defined as, but are not limited to:

- Impropriety in the handling or reporting of money or financial transactions.
- Misappropriation of funds, supplies, or other assets (e.g. use of agency vehicles for personal purposes such as shopping by individuals not entitled to do so).
- Profiteering as a result of insider knowledge of agency activities.
- Disclosing confidential and proprietary information to outside parties.
- Misrepresentation in a job application (e.g. falsifying qualifications or credentials).
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the agency.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related irregularity.

Discrimination occurs where a person treats someone less favourably on the basis of any of the following grounds; sex; race; colour; ethnic origin; religious belief; marital status; pregnancy or potential pregnancy; disability; family or carer's responsibilities; age; sexual preference or orientation or transgender identity.

Harassment is discriminatory behaviour that offends; intimidates; humiliates or targets another person and that person does not want that behaviour.

Victimisation occurs when a person is threatened or harmed for discriminatory reasons.

Vilification occurs through a public act that could incite or encourage hatred towards, or serious contempt; or severe ridicule of a person or group for discriminatory reasons.

Bullying is behaviour that is usually repeated, that is inappropriate, unreasonable and possibly aggressive that creates a risk of physical and /or psychological harm.

Sexual Exploitation and Abuse:

- Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
- Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Annex 2: Complaints record form

All complaints should be recorded on a separate form. Forms should then be saved in one central, safe and secure location. People may submit a complaint on another piece of paper or they may give a verbal complaint to a staff member. The staff member should then write that complaint on this 'Complaints Record Form' and submit it to the appropriate person.

Date: Date complaint is received	
Staff member/volunteer who received the complaint: Which staff member or volunteer first heard or collected this complaint?	
Personal details of complainant (person making the complaint): Name, contact details, if appropriate. If the complainant wishes to remain anonymous, no details are to be recorded here.	
Nature of complaint: What issue is this complaint related to?	
Details of complaint: A detailed description of the complaint the person has made	
Who dealt with it: Name of person who is or has responded to the complaint	
How it was dealt with: Action taken to handle the complaint	
Outcome: Outline of what has happened as a result of the complaint	
Follow-up required: Any action required as a result of the complaint. This may include a change to organisational procedures and policies.	

Written by:

Viewed by (Executive staff member):

Name Signature

Name Signature

Annex 3: Process for establishing complaints handling mechanisms

The following is a list of ideas and suggestions to be considered when establishing complaints handling mechanisms. ADRA Denmark will, when relevant, provide support and encouragement to all partners in their efforts to establish such a system.

- 1. Consult the affected community / target group** in order to design a complaints handling mechanism that will actually be used.
 - a. Take into account community preferences (e.g. some cultures find it difficult to complain face-to-face, in some places it is most appropriate to use local intermediaries);
 - b. Pay particular attention to preferences which are related to safety and confidentiality ;
 - c. What are the barriers which might stop people complaining (literacy, access to phones, social exclusion, etc.) and how can you overcome these? How can you make sure that everyone has the opportunity to complain if necessary?;
 - d. Bear in mind that other community members (e.g. non-selected beneficiaries) need to be able to complain too;
 - e. Be open to change - just because 'it's always been done this way' doesn't mean that something else couldn't also work.
- 2. Train staff** – make sure everyone understands the principles of accountability, the fact that complaints are to be welcomed, the need for confidentiality in certain cases, and the organisational procedure for dealing with serious allegations.
- 3. Assign roles and responsibilities** – Agree on all of the roles and documentation needed for your complaints handling mechanisms. Identify which staff member is responsible for collecting/ recording complaints, who will be responsible for investigating complaints and who will make decisions, etc.
- 4. Share information** about how to complain with the affected community / target groups.
 - a. Manage expectations. Provide a clear scope (what can be complained about) and timeframe (when they should expect a response), see Annex B for an example of a complaints record form;
 - b. Make sure the information about how to complain is available to everyone (e.g. not just 'important' or educated people);
 - c. Don't just announce the complaints mechanism once at the beginning of the project – this information needs to be shared multiple times throughout the life of the project.
- 5. Agree with local project partners** about how complaints will be received, dealt with and recorded.
 - a. When partner organisations are implementing some or all project activities, make sure responsibilities for complaints handling mechanisms are clear.
- 6. It is important to learn from the complaints handling process.** It is not a question of beating ourselves up for not being perfect, but more about using the information provided from complaints processes to ensure continuous improvement. When learnings are reviewed and shared systematically, they help to avoid similar complaints in the future i.e. they improve the quality of what we do.
 - a. Plan regular times for key programme and management staff to review learnings from complaints and introduce changes to future/ongoing activities as a result;
 - b. Where relevant, don't be shy to share (diplomatically) learnings with other organisations via clusters, NGO platforms, etc.

Annex 4: Guide to a child friendly complaint handling process

There is a need for an approach, that allows children the means to appropriately voice a complaint and for ADRA Denmark and partners to develop appropriate ways to listen, to be more responsive and accessible for children.

Children communicate in a different way to adults and need to know that:

1. the complaint is treated with respect;
2. the process is clear and accessible for children;
3. the procedures are responsive and flexible;
4. there is an advocate available;
5. there will be action taken.

The main elements of the child friendly mechanism are access and response. The following are some suggestions that can facilitate this:

- It is important to ensure that complaints can be made in a number of different ways (face-to-face, telephone, online, in writing);
- Allow complaints to be made anonymously when a complainant sends complaints through a friend or others involved in the project;
- Children and young adults feel more comfortable with face-to-face complaints, heard by someone who is respectful and patient;
- Make sure the child or young adults' comments are viewed as wanted and ensure a relaxed open environment;
- Telephone/email complaint mechanism should have someone answering them immediately;
- Make sure the person dealing with the child or young adults' complaint is an active listener who is helpful, understanding and responsive;
- Make sure that you respond to the child or young adult as soon as possible, even just to acknowledge receipt of the complaint;
- Give the child or young adult the option to choose how and whether they will be kept informed of the progress of their complaint;
- Let the child or young adult choose how often they would like to be kept up to date.

For systems implemented by partners, the following are also important to consider:

- Have a complaints officer who is appropriately trained to facilitate child friendly complaint handling procedures and to raise awareness with local community stakeholders and children of the procedures and how to implement them.
- Local staff have trainings in the proposed child friendly processes and procedures, interviewing children, facilitating feedback sessions with children and adults and recording of complaints. Regular refresher trainings and meetings are also held with them from time to time to equip them with new skills and share experiences.
- Ensure a conducive environment that guarantees confidentiality of any complainant.