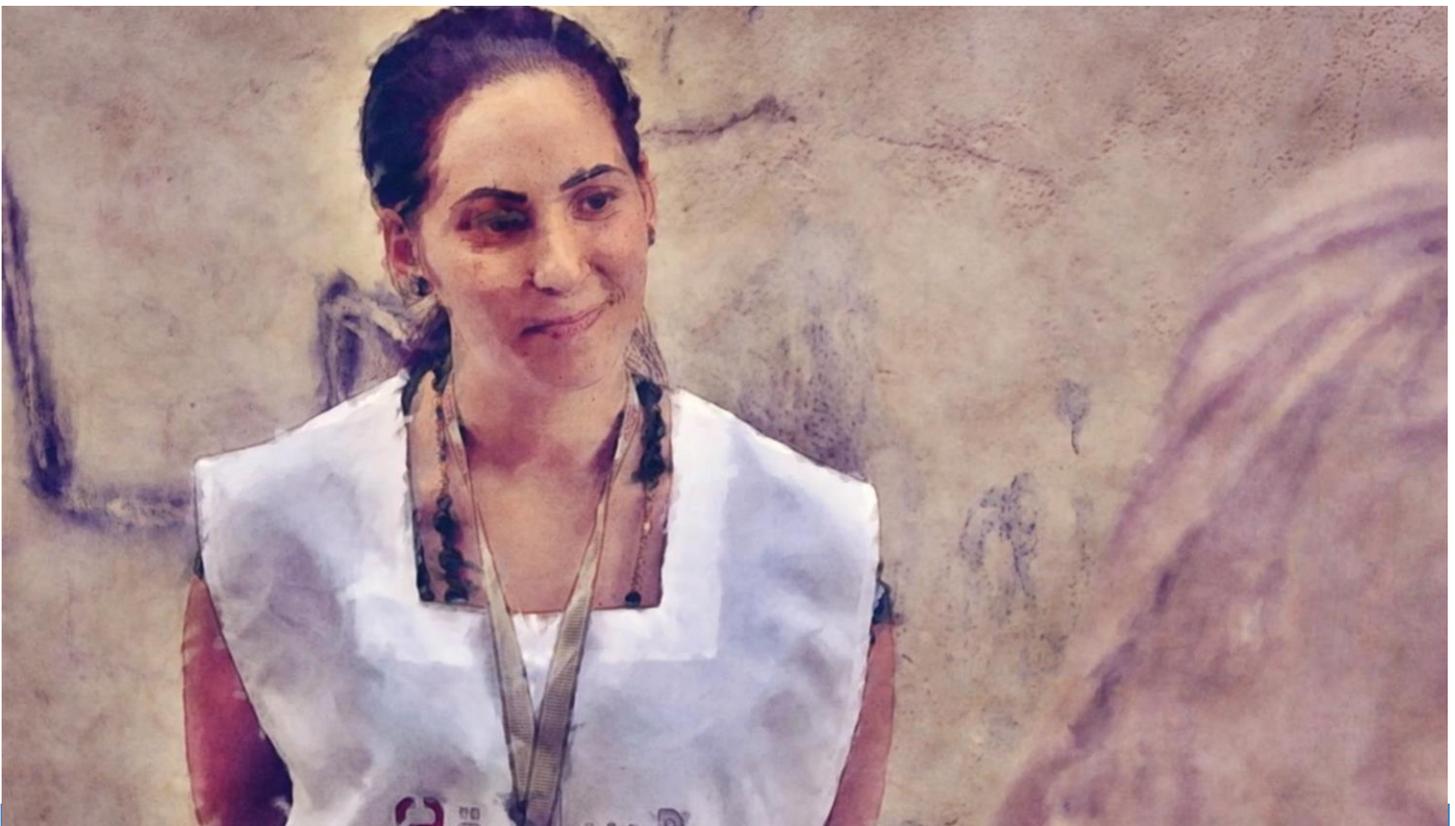


DRC CODE OF CONDUCT REPORTING MECHANISM ANNUAL REPORT 2019



DANISH REFUGEE COUNCIL

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DRC CODE OF CONDUCT REPORTING MECHANISM

ANNUAL REPORT 2019

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1. EXECUTIVE SUMMARY

The Danish Refugee Council (DRC) is hereby happy to present its Code of Conduct Reporting Mechanism (CoCRM) Annual Report 2019. The report has been produced by the Secretariat for Risk & Compliance and endorsed by DRC's Executive Committee. The report is organised into nine sections, including this Executive Summary, Section 1.

Section 2 offers an introduction to the report. It describes the Code of Conduct and CoCRM together as forming a cornerstone of DRC's commitment to accountability and integrity. The section goes on to outline the scope of the report and some of the terminology employed.

Section 3 details a few key achievements over the course of 2019 in relation to the Code of Conduct and CoCRM, such as: 1) Engagement with communities, beneficiaries, staff and other stakeholders about the right and opportunity to report resulting in an increased number of reports, 2) the increase of staff working at Gate B with the ability to manage an increased number of reports and investigations, 3) the important, continued focus on transparency around Code of Conduct complaints via the external Dashboard, 4) a much stronger organisational awareness raising and outreach to new staff member and managers via mandatory on-line training, cooperation with Core Humanitarian Standard Focal Point and mentoring of EU-volunteers working with implementation of CoCRM's in the country operations, 5) engagement within the Safeguarding agenda both internationally and internally in DRC, 6) much stronger focus on donor reporting and GDPR.

Section 4 offers a few notes on the data before the report presents this data itself. Data presented in the report is based on a "snapshot" of the online CoCRM database as of 3 March 2020. The data was extracted from the database following a brief data quality assurance process. Amongst other challenges, numerous issues related to gaps in and accuracy of the data remain from previous years. The use of NAVEX benchmarks against which DRC tracks its performance within certain areas related to the CoCRM is also presented in Section 4.¹

Section 5 is organised into ten sub-sections and presents numerous data tables and analyses thereof. Both the volume of reports per 100 employees (up to 5.23 from 5.2) and the overall number of reports received (444 up from 362) have increased in 2019 compared to 2018. The increase in the number of reports of suspected misconduct (RSMs) that DRC witnessed in last year's report thus continued over 2019, with an overall increase of 23%, and respective increases of 10% at the Gate A (Field) level and 38% at Gate B (HQ) level.² DRC interprets this as a sign of increased awareness both inside and outside the organisation about the standards

¹ Due to a delay in the Global 2019 NAVEX Report the benchmark will be against 2018 figures and DRC's Annual Report will be updated when the Global 2019 NAVEX Report is published.

² The Global Code of Conduct Team, based at DRC's Headquarters (HQ) in Copenhagen, Denmark, is responsible for the receipt and processing of RSMs at the global level. This team is referred to as the "Gate B Team" throughout the report. Code of Conduct Teams at the Country level are referred to as "Gate A Teams" and Code of Conduct Teams at Regional level are referred to as "Gate A+ Teams".

of behaviour demanded of DRC staff, as well as the overall increased maturity of the CoCRM anchored in a strong tone at the top. Nevertheless, the concern noted in the 2018 report that some Country Operations either did not register any RSMs on the CoCRM database or only did so at the Gate B level persists in 2019.

The capacity situation in relation to the CoCRM's to address the number of RSMs received at this level is described in Section 6, whereas Section 7 presents the report's key findings based on Sections 4-6.

Section 8 presents several key lessons learned based on DRC's work related to its the Code of Conduct and CoCRM over the course of 2019. Inspired by these and other lessons learned, Section 9 lists numerous recommendations for CoCRM-related work in DRC over the course of 2020 and beyond.



2. INTRODUCTION

A Cornerstone of Accountability and Integrity

The Danish Refugee Council (DRC) has had a Code of Conduct since 2007, and a Code of Conduct Reporting Mechanism (CoCRM) for International Operations since 2012. Together, they form a cornerstone of DRC's commitment to accountability and integrity. The Code of Conduct and CoCRM apply to all staff, volunteers, incentive workers and similar staff members in DRC's International Operations, including Danish Demining Group (DDG) staff. DRC's implementing partners are required to abide by the Code of Conduct when working on DRC's behalf, or to have and employ their own that either meets or exceeds DRC's. Anyone, be they

an internal or external stakeholder of DRC's work, can submit a complaint or report a suspicion of misconduct via the CoCRM.

To ensure organisational capacity to manage suspected irregularities and support whistle-blower functions, each CoCRM level (Country, Regional, HQ) is required to have the following roles:

- A Code of Conduct Focal Point;
- A Registrar to register all RSMs;
- An Intake Committee (composed of three to six staff) to review reports of suspected misconduct (RSMs) and decide on an appropriate response;
- An Authorising Officer (AO) to authorise and manage investigations; and
- Trained investigator(s); at HQ level there is a pool of trained and experienced investigators, including six Core Humanitarian Standard (CHS) approved; DRC will also draw on external expert administrative investigation capacities when necessary.

The process for making complaints is made clear to all staff as part of onboarding process. Information about how to report and the subsequent process is readily accessible to all staff – by consulting the [Operations Handbook](#) or DRC's [internal](#) or [external](#) ([drc.ngo/relief-work/concerns-complaints/code-of-conduct](#)) online resources where new mandatory Code of Conduct training packages are also available – and advice is available from managers and specialists at HQ. Any staff member that makes an RSM is explicitly advised at the start of the process that they are entitled to protection against retaliatory action. DRC will duly pursue all claims of retaliation. If a complaint concerns an individual involved in DRC's CoCRM, staff are advised to report their concerns to the CoCRM level above the level implicated.

The CoCRM is based on values and guidelines that conform to the core principles of administrative investigations conducted by international humanitarian organisations. Core principles include the:

- Right to due process;
- Right to confidentiality;
- Right to protection against retaliation;
- Right to notification of status; and
- Right to respond to an RSM.

The CoCRM has been designed in a manner that provides for maximum independence by assuring a proper segregation of roles and responsibilities. This also implies that affected management will not in any way be part of running an investigation, and that relevant, non-affected senior management that will take the formal decision on possible disciplinary action has not been involved in the actual investigation.

DRC staff are duty-bound and trained to report any suspicions of misconduct by DRC staff, implementing partners, or other actors related to DRC's mandate, including the staff of other NGOs and donors. As noted above, however, anyone can submit an RSM via the CoCRM. As such, the CoCRM serves to function both as DRC's internal whistle-blower system and as a

reporting mechanism to which RSMs from external stakeholders, including beneficiaries, are channelled and handled according to robust due process procedures.

Scope and Limitations

This CoCRM Annual Report 2019 does not provide descriptions or analyses at the level of individual complaints, cases or regions, nor will it normally address country-specific data. Rather, the focus is at the global aggregate level or according to the split between RSMs handled by the HQ Gate B Team and those handled by Gate A and Gate A+ Teams in the Field.

Terminology

The report generally uses the term “*report of suspected misconduct*” (RSM) to describe what might otherwise be called a “*complaint*” or “*report*.” These three terms are used interchangeably in the report.

Please note that any given RSM may relate to one or more individuals suspected of misconduct, i.e. “*subjects*.” Each subject of an RSM has a respective case assigned to them. Consequently, for the total number of RSMs received in 2019 and the total number of subjects/cases in 2019, the latter exceeds the former.³ Similarly, an RSM can also concern multiple types of suspected misconduct, which explains why the total number of subjects/cases is exceeded by the total number of types of misconduct reported.⁴

The Code of Conduct Team based at DRC’s Headquarters (HQ) in Copenhagen, Denmark, is responsible for the receipt and processing of RSMs at the HQ level that relate to DRC’s International Operations. This team is referred to as the “*Gate B Team*” throughout the report. Code of Conduct Teams at Country and Regional levels are referred to as “*Gate A and Gate A+ Teams*.”

Similarly, RSMs received and cases handled by the Gate B Team fall under the category “*Gate B*”, whereas those received and handled by Gate A Teams at Country and Gate A+ Teams at Regional levels fall under the category “*Gate A*” and “*Gate A+*” in the data tables and analyses below.

The terms “*beneficiaries*” and “*people of concern*” are used interchangeably in this report.

3. KEY ACHIEVEMENTS

1. The number of reports continues to rise, and beneficiaries are still high on the list of complainant type (third compared to second most frequent complainant type in 2018). This is interpreted as a sign that some Country Operations are becoming more effective at communicating the right and opportunity to report to beneficiaries, staff and other stakeholders. It also suggests evidence of a global trend observed by DRC and other organisations that people are generally more aware of the standards of

³ Cf. Tables 2-4 & 6 with Table 7 below.

⁴ Cf. Tables 7-8 with Table 9 below.

behaviour they can expect from humanitarian organisations and their rights and access options to voice concerns if those standards are not met.

2. A monthly updated dashboard with key statistics on the CoCRM continues to be available on the DRC website (see the [online dashboard](https://gms.drc.dk/viz/coc), gms.drc.dk/viz/coc). This dashboard allows external stakeholders and the general public to follow the development on some key CoCRM indicators over the years. Furthermore, minor but important adjustments were made to the CoCRM database which have made it easier to track and extract certain information related to complaints and cases.
3. A stronger organisational focus was achieved beyond the management and staff directly involved in complaint and case handling processes, such as via training and awareness-raising sessions for new staff members. External funding from the Færch Foundation funded a position in HR Talent Team to strengthen the outreach to frontline staff and people of concern through the development and roll out in 2019 of several mandatory online training packages for new staff members and training packages for Face-2-Face training at field level.
4. Safeguarding measures throughout the employment cycle were introduced with an accompanying toolbox. A Safeguarding and Child Safeguarding Policy was developed and rolled out as a component of the increased focus on Safeguarding.
5. DRC participated actively in national and international events related to improving Safeguarding in humanitarian interventions. In London, a team member gave a presentation on Code of Conduct issues at an international conference organized by Bond. Internationally DRC has participated actively in several events, including participation in the CHS (Core Humanitarian Standard) organised investigation of sexual exploitation and abuse (SEA) course. In Denmark, DRC has been active in the Safeguarding Network managed by Global Focus.
6. Gate B was rightsized with the addition of three full-time staff member (bringing the total to four) to manage the increased workload from complaint intake and case handling including increased number of investigations. The team also supported more country operations to establish and administer the Code of Conduct Reporting Mechanisms.
7. The Code of Conduct Team Gate B mentored five EU Volunteers with the aim to support the operations of DRC Tanzania, Uganda, Kosovo and Georgia by researching best practices and provide recommendation on how to increase understanding of DRC's Accountability framework and Code of Conduct, including innovative approaches to ensure visibility for hard-to-reach persons of concern.
8. The Code of Conduct Team Gate B worked together with the DRC's CHS focal point and the MEAL unit to prepare a framework of DRC's broader approach to stakeholder participation in relation to the design, implementation, monitoring and evaluation of its Feedback and Complaints Response Mechanism (F-CRM) for operational and programmatic complaints and CoCRM.

9. The Code of Conduct Team Gate B worked with one of the EU-AV's on a comprehensive research paper that will form the basis for a Survivor Centered Approach in DRC to be rolled out formally in late 2020 or beginning of 2021.

Survivor-centred approach in Code of Conduct report-handling mechanisms

A **survivor-centred approach** is one where the wellbeing and the wishes of the survivor of an incident are put at the centre of all actions taken (Bond, 2019). A broad consensus of the core elements that underpin a survivor-centred, rights-based approach has emerged (IASC CEB, 2018). These elements are:

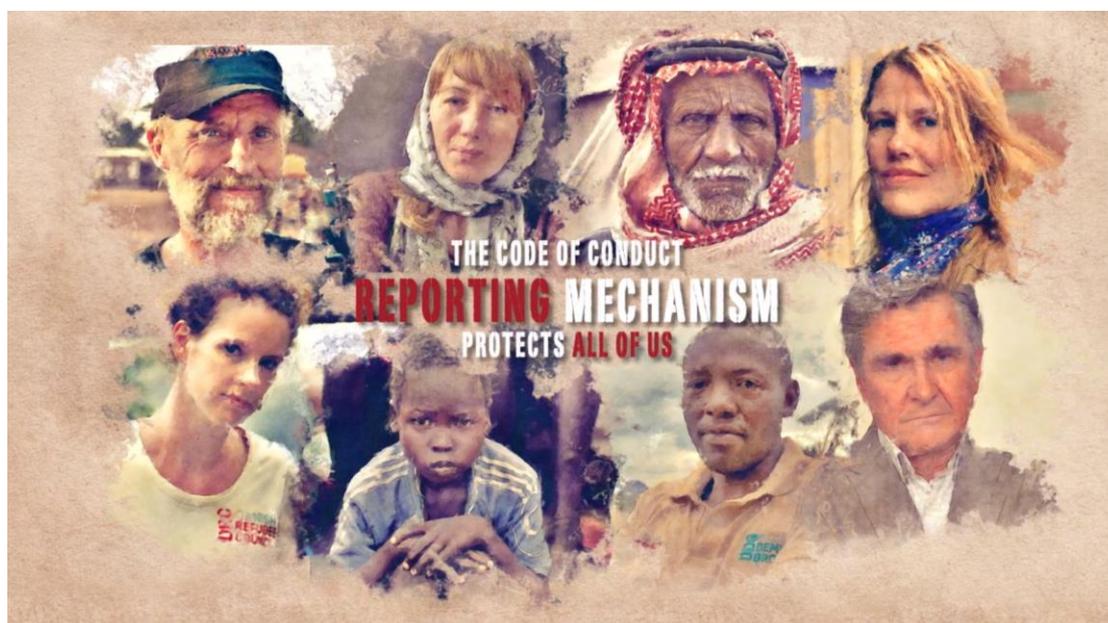
- ◆ Safety. The safety and security of the survivor is the number one priority for all actors (IFRC, 2018).
Survivors have a right to information about the process, and safety and protection from reprisals, harassment and retaliation (IASC CEB, 2018) (Oxfam, 2019c) (United Nations, 2020b).
- ◆ Do no harm (IASC CEB, 2018). **No action should be taken that would worsen the situation of a survivor of SEA** (IFRC, 2018).
- ◆ Respect (IFRC, 2018) (Oxfam, 2019c) (United Nations, 2020b).
 - Survivors' perspectives and wishes (self-determination) and best interests are taken into account for all actions (IASC CEB, 2018) (IFRC, 2018) (Bond, 2019).
 - Survivors are treated with empathy, dignity and respect throughout the process, demonstrating **belief and trust** (IASC CEB, 2018) (Bond, 2019).
 - **The need to craft a tailored response to survivors**, especially to those in particularly vulnerable situations, such as children, people with disabilities, and LGBTQI+ individuals (IASC CEB, 2018).
- ◆ Confidentiality. Survivors have a right to privacy and confidentiality, so that **information is not disclosed without informed consent**, ensuring that issues will be handled in confidence in every aspect of case handling (IASC CEB, 2018) (IFRC, 2018) (Bond, 2019) (Oxfam, 2019c) (United Nations, 2020b).
- ◆ Non-discrimination. Equal and fair treatment to anyone in need of help due to a SEA incident (IFRC, 2018). No limitations on who reports or when they report. An individual can report a concern or incident at any time after it happens. Everyone is able and encouraged to report (Bond, 2019).
- ◆ Investigations need to be timely, professional and **timebound at each stage** (IASC CEB, 2018) (Bond, 2019).⁵

10. Due to the Oxfam case there has been an increased focus from Donors regarding reporting, which we have responded to in a more systematic, professional, and comprehensive way. This has been a very time-consuming, but necessary task for the team, senior management and for the country operations.

11. Living up to the new GDPR regulations have been on the agenda for not only the Code of Conduct Team, but also for HR and the Legal advisors in HQ trying to get a deeper understanding and being able to apply it also because we are working with third party

⁵ Extract from study made by EU-volunteer Claudia Arnau de Frutos during her work in CoC team.

actors (US, UN) where GDPR does not apply. The work will continue in 2020 and the coming years. In that line, DRC has recently joined the INGO Lawyers Group A4ID – a loose professional collective of in-house lawyers from all the major INGOs set up to act in a concerted manner and arrive at common positions to common issues facing the sector as a whole.



4. NOTES ON THE DATA

The data used in this report is based on an extract from DRC's online CoCRM database following a brief data quality assurance process. All data in the report is based on data entries by CoCRM Registrars in relation to RSMs received by DRC in 2018 between 1 January 2019 and a cut-off date of 3 March 2020. The data presented herein reflects a "snapshot" of the data in the CoCRM database as of 3 March 2020. Consequently, the data here may differ from that shown on DRC's public [online dashboard](https://gms.drc.dk/viz/coc) (gms.drc.dk/viz/coc) that provides an overview of certain elements of CoCRM-related data.

The challenges with the online CoCRM database in terms of data quality and structure identified in the CoCRM Annual Report 2018 remain. The data is regularly revised and updated on the online database, and interpretation of the data fields by the Registrars entering the data is not always consistent. Accordingly, any conclusions one may draw from the data should be understood as tentative, open to potential change and correction, and treated with caution rather than as representing firm facts.

The analysis of data in the report is, for the most part, done at the level of receipt of RSMs and resulting cases, and not solely in relation to data from cases where the suspected misconduct has been substantiated (proven). This reflects a conscious decision based on the fact that the CoCRM functions first and foremost as a channel to ensure that staff, persons of

concern and other stakeholders can report suspected misconduct to DRC in a safe, accessible, confidential and trusted manner. Furthermore, the decision reflects the position that the CoCRM must follow due process; the focus is thus primarily on process rather than its outcomes. As such, the report primarily provides insight into: 1) suspected or perceived misconduct, rather than what actual misconduct may have taken place – this is compounded by the fact that the report contains data in relation to both closed *and* still open, ongoing complaints and case handling from 2019; 2) the ability of the CoCRM to function as an effective channel for stakeholders’ grievances and complaints; and 3) the organisation’s ability to respond appropriately.

Benchmarks

The CoCRM Annual Report 2016 introduced the use of global benchmarks to measure the effectiveness and performance of DRC’s CoCRM. The benchmarks are retrieved from NAVEX Global.⁶ The benchmark variables selected for this year’s report are the same as in 2018: 1) report volume per 100 employees; 2) increase in overall reporting; 3) overall substantiation rate for investigated RSMs; and 4) processing time for a report. DRC’s performance in relation to these benchmarks is presented in *Table 1* below. More detailed analyses of DRC’s performance against these benchmarks is offered in various sections of this report.

Table 1

Benchmark	NAVEX 2018	DRC 2019
Report volume per 100 employees	1.4 ⁷	5.3 ⁸
Increase in overall reporting	56% since 2010	134% since 2016 / 23% since 2018 ⁹
Overall substantiation rate	46%	34% ¹⁰
Median processing time (calendar days)	44	59 ¹¹

The NAVEX 2018 report volume ranges between 0.3 and 11 reports per 100 employees with a median of 1.4 – that is, half of 2,479 NAVEX customers’ report volumes exceeded 1.4 per 100 employees in 2018.¹² DRC’s volume of 5.3 reports per 100 employees is significantly

⁶ NAVEX is a commercial, global IT solution to support, among other things, the tracking of reporting to ethics hotlines. Please see <https://www.NAVEXglobal.com/en-us/resources/benchmarking-reports/2018-hotline-incident-management-benchmark-report?RCAssetNumber=3309> for more information about the benchmarks selected for this report. Due to a delay in the Global 2019 NAVEX Report the benchmark will be against 2018 figures and DRC’s Annual Report will be updated when the Global 2019 NAVEX Report is published.

⁷ It should be noted that NAVEX includes policy enquiries as well for this benchmark, whereas DRC does not. The number of employees used to calculate the benchmark in DRC is taken from staff figures extracted from DRC’s ERP system on 15 December 2018. The calculation for 2019 is 444 RSMs / 8,317 staff members (as of 4 May 2020) * 100 = 5.3.

⁸ This figure was 2.9 for 2016, 3.2 for 2017 and 5.2 for 2018.

⁹ See *Table 2* below.

¹⁰ The NAVEX method and DRC divides “the number of overall investigation reports that are...substantiated by the total number of reports that were closed as substantiated...and unsubstantiated.”

¹¹ See *Table 14* on page 22 below.

¹² The median is distinct from the average. It is the value separating the higher half of a data set or a probability distribution, from the lower half. For a data set, the median may be thought of as the “middle” value. The

higher than the NAVEX 2018 median of 1.4 per 100 employees. Relative to the high end of the spectrum, however, a report volume of 5.3 indicates that DRC is neither subject to serious underreporting nor serious overreporting. It does, however, represent a significant increase in report volume since 2017, which is up more than two points from 3.2.

The increased level of reporting in DRC year-on-year may be attributed to a number of possible trends:

- Increased management tone at the top;
- Maturing Code of Conduct and CoCRM setups supported by ongoing awareness-raising and training mean more employees recognise the need to report suspected misconduct and know how to do so;
- Employee confidence that reporting will make a difference in the organisation;
- More media attention – and therefore employee and stakeholder awareness of – rights, whistle-blower protections, lawsuits and awards;
- Greater awareness amongst people and communities of concern about the standards of behaviour demanded of DRC staff, how to report, as well as increased trust in the reporting system.

Observations related to DRC’s substantiation rate and median processing time for complaints and resulting cases are offered below in Sections 5.8 and 5.9 below.

5. DATA ANALYSIS

5.1. General Observations

Table 2 below records the number of RSMs registered on the CoCRM database. It does not represent a record of responses to or outcomes of RSMs received.¹³ Responses and outcomes are presented later in Table 10 and Table 11. Image 1 illustrates the increase in the number of RSMs year on year since 2016.

Table 2

Gate	2016	2017	2018	2019
Gate A	135	143	253	278
Gate A+		6	7	18
Gate B	55	78	107	148
Grand Total	190	227	367	444

median denotes or relates to a value or quantity lying at the midpoint of a frequency distribution of observed values or quantities, such that there is an equal probability of falling above or below it.

¹³ RSMs are not always investigated. There is a range of options depending on the nature of the report, e.g. Referral to Management (or HR), Record for Information, Case Suspension (if it is not possible to investigate), and Investigation.

Image 1

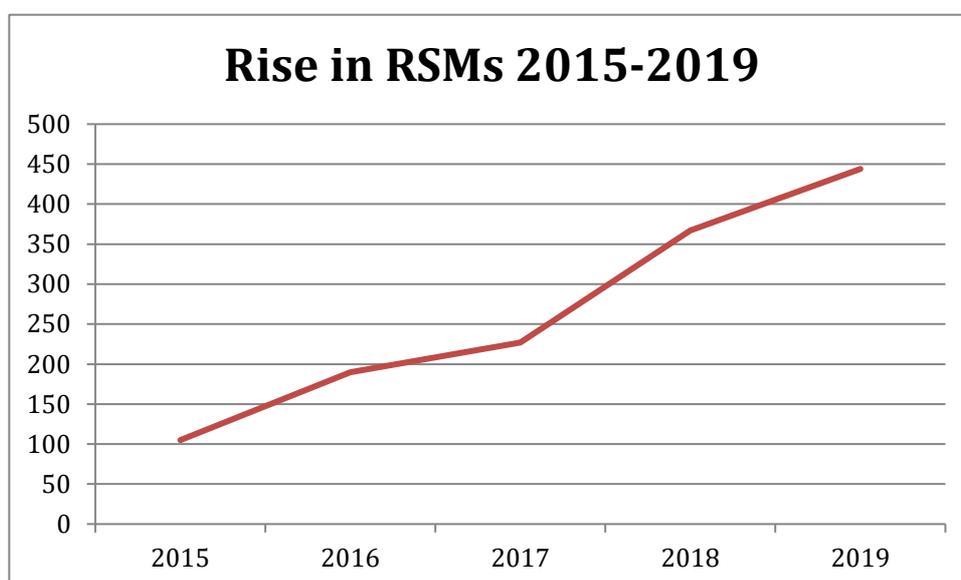


Table 3 provides an overview of the status of RSMs in the CoCRM database as of 3 March 2020.

The rise in number of RSMs received between 2018 and 2019 could be an indication that the intake of RSMs is reaching a level more equal to the effort invested into outreach and development. It is, however, not possible to identify the exact reasons for this growth. Moreover, as the report shows in Table 4 below, there are still some Country Operations that have only register a limited number of RSMs on the database.¹⁴ DRC expects the rise in number of RSMs to increase again in 2020¹⁵. Efforts to better embed the CoCRM in Country Operations where this has been particularly challenging, and in Country Operations from which few or no RSMs have been registered, will likely provide a further boost in the number of RSMs.

Table 3

RSM Status ¹⁶	Gate A	Gate A+	Gate B	Grand Total
Open	64	11	15	90
Closed	214	7	133	354
Grand Total	278	18	148	444

In 2018 one-third of the RSMs received were still open at the time of the annual report writing, so there is definitely an improvement in the case handling process as approximately only one-

¹⁴ See Table 5 below.

¹⁵ Although the impact of Covid-19 might have a dampening effect.

¹⁶ As of 3 March 2019.

fifth of RSMs received in 2019 are still “Open” at the time of the annual report writing. Open cases contribute to the number of gaps in the data at the time of reporting, especially in the area of outcomes.

5.2. Number of Reports of Suspected Misconduct by Country and Region

Table 4 below presents the number of RSMs registered on the database by Country Operation Gate A (Country level) and A+ (Regional level).

Table 4

Country	Gate A	Gate A+	Gate B	Grand Total
Iraq	33	6	28	67
Bangladesh	37		7	44
Afghanistan	39		4	43
Uganda	23	1	7	31
Turkey	12	1	16	29
Myanmar	14		9	23
DR Congo	8		14	22
Greece	18		4	22
Yemen	16	1	5	22
Jordan	11		4	15
South Sudan	6	1	8	15
Somalia	11		2	13
Tanzania	8	1	3	12
Ethiopia	8		3	11
Bosnia and Herzegovina	4		6	10
Nigeria	5		2	7
Syria	2	2	3	7
Djibouti	6	1		7
Kenya	2	1	2	5
Libya	2	1	2	5
Niger	3		2	5
Colombia	1		4	5
Lebanon	4	1		5
Ukraine			4	4
Mali			3	3
Serbia	1		1	2
Tunisia		1	1	2
Central African Republic	1		1	2
Denmark			1	1
Algeria			1	1
Senegal	1			1

Guinea	1			1
Burkina Faso	1			1
Kosovo			1	1
Grand Total	278	18	148	444

In total, 34 Country Operations registered RSMs on the database over 2019 which is an increase from 29 Country Operations in 2018. *Table 5* below shows which Country Operations did not register any RSMs on the database in 2019, and which Country Operations only registered RSMs at Gate B.

Table 5¹⁷

No RSMs Registered	Registered at Gate B Only
Georgia	Algeria
Iran (closed March 2019)	Denmark
Sudan	Kosovo
Vietnam	Ukraine

Note: no country has A+ only reports in 2019.

Whilst it is a concern that 4 Country Operations did not register any RSMs in 2019 in comparison to 2018 where 13 Country Operations did not register any RSMs, this is an improvement. There could be different reasons for this, including the fact that some of these Country Operations (Iran and Vietnam) have been in exit mode with very few operational activities and few staff.

That four Country Operations only registered RSMs via Gate B raises similar concerns. However, the fact that reports are nevertheless raised at Gate B shows that complainants are at least in some way able to access the CoCRM, even though this may not be at the Country level. It is also important to note that some RSMs registered at Gate B may have been originally been received at Gate A level and then escalated.

It is notable that Iraq, Bangladesh and Afghanistan have received a very high number of RSMs in 2019. From having worked closely with these Country Operations from the side of Gate B, it is confirmed that the Field teams and management have invested substantial efforts into working with and boosting the tone at the top and traction around the Code of Conduct and CoCRM in-country.

The Country Operations with reporting challenges vary from year to year. This can also be observed when comparing 2018 and 2019. This may be an indication that capacities, focus and operational conditions (e.g. funding) at Country levels influence the number of reports raised. Only one Country Operations (Sudan) seem to consistently register no RSMs at all. Management is recommended to look into this Country Operations in particular.

¹⁷ Denmark is registered with a very limited number of RSMs based on the fact that the Code of Conduct and CoCRM, according to its current status, does not normally apply in Denmark.

5.3. Who is Reporting?

The following table shows data on the types of complainants submitting RSMs registered at Gates A, Gate A+ and B respectively in 2019:

Table 6

Complainant Type	Gate A	Gate A+	Gate B	Grand Total
Frontline Staff – Current ¹⁸	94	5	20	119
Management - Current	26	2	36	64
Beneficiaries	39		25	64
Support Staff - Current	44	3	16	63
Anonymous	38	1	12	51
Frontline Staff - Former	10	2	11	23
Other External Stakeholder	12	1	9	22
Support Staff - Former	4	2	6	12
Vendor	3	2	1	6
Management - Former	1		4	5
Implementing Partner	4		1	5
(I)NGO			4	4
Public Authority	2		1	3
HQ Staff – Current	1		1	2
Donor			1	1
Grand Total	278	18	148	444

The most notable changes from 2018 is that Anonymous complaints now form a significant proportion of complaints. Beneficiaries are the third highest category that complain. This may be a positive sign that organisational efforts towards building beneficiaries’ awareness of the CoCRM as well as ensuring their safe and trusted access to it have had an effect, even though the number of beneficiary complaints is still small in comparison with the number of beneficiaries DRC is reaching.

5.4. Who are the Subjects?

The following table presents data on the types of subjects suspected of misconduct according to RSMs registered at Gates A, A+ and B respectively in 2019. These figures refer to the number of cases, not the number of complaints received, as there can be multiple subjects/cases per RSM. Each case refers to one person who is the subject of the complaint received and particular form(s) of misconduct suspected by the subject.

¹⁸ “Current” refers to the staff member’s employment status at the time the RSM was received, not necessarily the staff member’s current employment status with DRC at the time of reporting.

Table 7

Subject Type	Gate A	Gate A+	Gate B	Grand Total
Frontline Staff Current	131	3	28	162
Management - Current	31	5	85	121
Support Staff - Current	62	5	20	87
Unidentified	45	3	33	81
Frontline Staff - Former	9		7	16
Not Subject to CoC	8		2	10
Implementing Partner	5		3	8
Support Staff - Former	3		2	5
Management - Former		1	3	4
HQ Staff – Current			1	1
Grand Total	294	17	184	495

Frontline staff is the group most complained about. The high number of complaints against management continues from 2018, where complaints about management in 2019 has gone up from third to second most complained about.

5.5. Subject Gender

Table 8

Gender	Gate A	Gate A+	Gate B	Grand Total
Female	58	3	26	87
Male	195	8	107	310
Unknown	41	6	51	98
Grand Total	294	17	184	495

Updates to the database in 2018 have enabled DRC to more meaningfully collect and extract data related to subjects' gender, provided the information is known and entered into the database by Registrars (else it is recorded as Unknown). The figures show that the majority of subjects are male, but since the majority of male staff (expats and national staff) in DRC's International Operations are also male, this points to a highly proportionate relation between staff gender and subject gender.

5.6. Types of Suspected Misconduct

The following table shows data on the types of suspected misconduct registered at Gates A, Gate A+ and B respectively in 2019, presented in descending order according to the number

of times they were reported.¹⁹ The percentage split of misconduct types is illustrated in *Image 2* below.

Table 9

Type of Misconduct	A	A+	B	Total
Corruption / fraud	124	8	47	179
Abuse of authority	86	4	50	140
Breach of duty	50	3	61	114
Workplace harassment	21	1	28	50
Sexual exploitation & abuse	14	0	32	46
Theft	26	1	2	29
Sexual harassment	10	0	16	26
Violence / assault	13	0	3	16
Retaliation	6	0	7	13
Unspecified	43	3	23	69
	393	20	269	682

With reference to *Table 7* above regarding subject types, the types of misconduct in relation to which current frontline staff most often find themselves subject of an RSM are, in descending order: 1) corruption and fraud; 2) abuse of authority; and 3) Breach of Duty.

Table 9a

Type of Misconduct	A	A+	B	Total
Corruption / fraud	53	2	8	63
Abuse of authority	53	1	5	59
Breach of duty	29	0	4	33
Unspecified	19	0	5	24
Sexual exploitation & abuse	6	0	17	23
Workplace harassment	10	0	4	14
Theft	10	0	1	11
Violence / assault	11	0	0	11
Sexual harassment	1	0	4	5
Retaliation	3	0	1	4
	195	3	49	247

The types of misconduct in relation to which current support staff most often find themselves subject of an RSM are, in descending order: 1) corruption and fraud; 2) Breach of Duty; and 3) Abuse of authority.

¹⁹ Note that more than one type of misconduct can be linked to a given complaint and case. The number of times types of misconduct have been tagged (692 not including blanks) does not therefore correspond to the number of RSMs received (444) and subjects suspected (495).

Table 9b

Type of Misconduct	A	A+	B	Total
Corruption / fraud	35	3	8	46
Breach of duty	7	2	9	18
Abuse of authority	11	0	2	13
Unspecified	9	1	2	12
Theft	11	0	0	11
Workplace harassment	3	0	2	5
Sexual exploitation & abuse	2	0	3	5
Sexual harassment	4	0	1	5
Violence / assault	1	0	0	1
Retaliation	1	0	0	1
	84	6	27	117

The types of misconduct in relation to which management staff most often find themselves subject of an RSM are, in descending order: 1) abuse of authority; 2) corruption; and 3) Breach of duty followed closely by Workplace harassment. This is consistent with findings in 2018, although in 2018 the order of Breach of duty and workplace harassment were the reverse. However, what is of special concern is the number of reports on Sexual harassment and Sexual exploitation & abuse that amounts to 25 RMSs, which is then the fourth main category of types of misconduct reported on management.

Table 9c

Type of Misconduct	A	A+	B	Total
Abuse of authority	15	3	36	54
Corruption / fraud	13	1	22	36
Breach of duty	4	1	29	34
Workplace harassment	7	1	20	28
Sexual harassment	2	0	11	13
Unspecified	2	2	9	13
Sexual exploitation & abuse	2	0	10	12
Retaliation	0	0	5	5
Violence / assault	0	0	2	2
Theft	2	0	0	2
	47	8	144	199

To varying extents, however, frontline, support and management staff can of course be the subject of virtually all types of misconduct.

The high number of reports where the type of misconduct is categorised as “Unspecified” can reflect of number of things. “Unspecified” can be an indication that: 1) staff, beneficiaries and other stakeholders use the CoCRM to raise issues that are not related to any of the forms of misconduct covered by the CoCRM system, but rather other concerns, such as staff

grievances, programme/operational issues and complaints, queries about entitlements, other organisations etc.; or 2) the reports do not concern suspicions of misconduct at all, or concern forms of suspected misconduct that might be captured more broadly by some form of breach of duty, such as the failure to report misconduct, failure to abide by DRC safety requirements, breach of confidentiality, and so on.

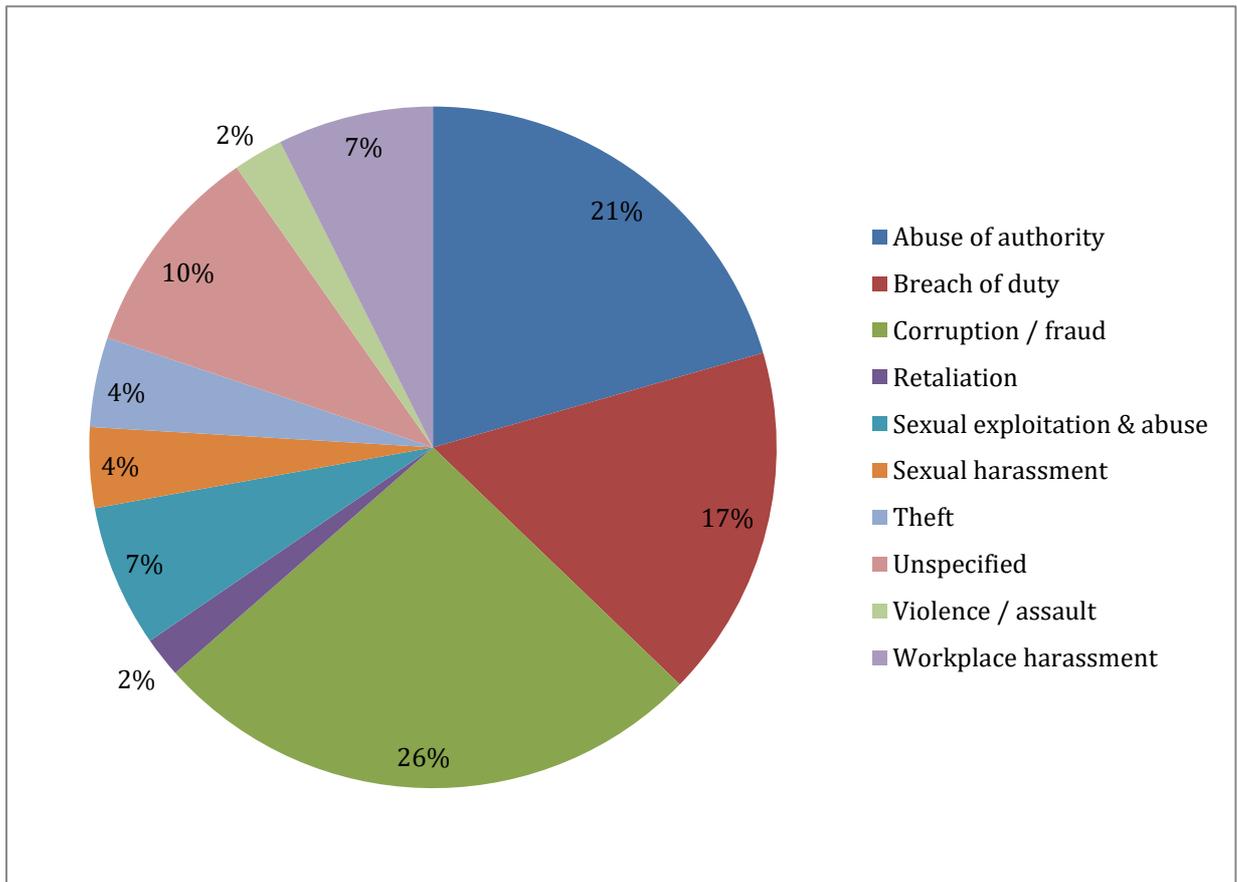
Sexual Harassment, Exploitation and Abuse

DRC holds sexual harassment, exploitation and abuse to constitute particularly egregious forms of misconduct, not least because of the severe impact such misconduct can have on survivors. The specific focus on data related to these forms of misconduct here reflects the importance DRC assigns to tackling it. As of 3 March 2020, 72 RSMs received during 2019 had been registered online in relation to sexual misconduct (i.e. to either sexual harassment, sexual exploitation and abuse, or a combination of these). Gate A registered 24 of these, whereas Gate B registered 48. No RSMs were registered at Gate A+. The 72 RSMs received and registered in relation to sexual misconduct in 2019 represent an increase to the 62 received and registered in 2018, and the 43 received and registered in 2017. RSMs related to sexual misconduct over the past three years have gradually increased. The proportion of sexual misconduct complaints out of all complaints has largely remained the same since 2017, however; whereas it was 18% in 2017 (39 RSMs out of 212), 17% (62 RSMs out of 362 total) in 2018, it is 16% in 2019 (72 RSMs out of 444 total). Sexual harassment as a distinct form of sexual misconduct was linked to 9% of RSMs in 2017, 12% in 2018 and 6% in 2019. SEA was linked to 10% of RSMs in 2017, 8% in 2018 and 10% in 2019.

DRC launched thirty-two investigations into suspected sexual misconduct over the course of 2019. Fourteen of these investigations substantiated the suspected sexual misconduct. Of the remaining eighteen investigations, two remained open as of 5 May 2020, fourteen did not substantiate the suspected sexual misconduct and ended in closure reports – meaning the investigation did not find enough factual evidence that the misconduct had occurred – and two concluded in an investigation report that proved minor misconduct, not the suspected sexual misconduct. The substantiation rate on closed cases related to investigations into sexual misconduct in 2019 is 44%. Ten of the fourteen cases of substantiated sexual misconduct lead to the subject of the investigation being dismissed by DRC. In the remaining four cases of substantiated sexual misconduct, the contract of the subject ended before the end of the investigation which therefore lead to the non-renewal of the subject's contract.

The number of RSMs related to sexual misconduct is still expected to increase in coming years in correlation with increased training, awareness-raising and participatory activities targeting internal and external stakeholders, including people of concern, about sexual misconduct, DRC's position on it, and how to report it. The hope is that DRC will experience increase trust in the CoCRM system so that DRC will receive and be in a position to address as many issues related to sexual misconduct as possible.

Image 2



5.7. Intake Committee Response

All RSMs are processed by Intake Committees at either Gate A, Gate A+ or Gate B. There are seven standard options within the range of possible Intake Committee responses: 1) Preliminary Assessment; 2) Investigation; 3) Referral to Management; 4) Referral to HR; 5) Referral to Another Organisation; 6) Suspension (refers to the case, not the subject thereof); and 7) Record for Information. Alternatively, Intake Committee’s at Country, Regional and HQ levels might refer RSMs to the Intake Committees of another level, such as HQ-Regional, Country-HQ.

Out of the total of 495 cases opened in 2019 as a result of RSMs, Intake Committees decided on investigation as the appropriate response in 146 cases (29% of the time).²⁰ “Blank” denotes blanks in the data set.

The following table shows how many times a given Intake Committee decision was taken by Gates A, Gates A+ and B respectively:

²⁰ Please note that any given RSM may relate to one or more persons suspected of misconduct, i.e. “subjects.” Each case is delimited to just one subject. Intake Committee responses are spurred by RSMs but relate to and are counted according to number of subjects/cases.

Table 10

Intake Response	Gate A	Gate A+	Gate B	Grand Total
Referred to Management	70	5	71	146
Investigation	83	3	60	146
(blank)	67	1	7	75
Recorded for Info.	22	1	18	41
Preliminary Assessment	23		6	29
Referred to Regional CoCRM	6	6	7	19
Contractual Referred to HR	2	1	13	16
Referred to Country CoCRM	13			13
Referred to Another Organisation	3		2	5
Case Suspended	4			4
Referred to HQ CoCRM	1			1
Grand Total	294	17	184	495

The number of cases linked to RSMs received in 2019 that went to investigation according to Intake Committee responses recorded as of 3 March 2020 has decreased from 168 in 2018 to 146 in 2019. The drop is mainly due to less investigation at Gate A level, where the number of Investigations has gone down from 134 in 2018 to 83 in 2019, however the number of cases recorded “blank” at Gate A has increased from 23 in 2018 to 67 in 2019 which might be one explanation to the drop. Investigation at Gate B have increased from 34 in 2018 to 60 in 2019. The number of cases referred to management have also increased from 119 in 2018 to 146 in 2019. Cases are typically referred to management when they concern minor misconduct only. There are other reasons a case may be referred to management, however, including the impossibility of investigating due to access and safety concerns, or that the report is determined not to concern misconduct, but rather other types of feedback and complaints.

The Intake Response of “Preliminary Assessment” (PA) is procedurally overwritten by an ultimate Intake Committee response to investigate or another appropriate response. The essence of a PA is to answer two questions to determine if an investigation is merited: 1) is the alleged action possible; and 2) if the alleged action did occur, would it constitute misconduct? If the answer is “no” to either of these two questions, then there will not be an investigation and the complaint returns to the Intake Committee for an alternative response. If the answer is “yes” to both questions, then a full investigation is authorised.

The Intake Response tag of “PA” is overwritten in the database when an ultimate Intake Committee response is determined.

5.8. Investigation Outcomes & Substantiation Rate

The table below presents figures related to investigation outcomes. An investigation report means that the case was substantiated (proven).²¹ A closure report means that the case was unsubstantiated (not proven). “Blank” indicates a variety of outcomes, such as the case having been suspended, that no report was finalised, that the case is still open, or that the data has simply not been recorded or updated. An example is that a case is started as an investigation and then later referred to management, but in the database, it is still recorded as an investigation. Another example is referral to Country and Regional Office after an initial assessment at Gate B and a different response is then decided by Intake Committee at Gate A or Gate A+.

Table 11

Investigation Outcome	Gate A	Gate A+	Gate B	Grand Total
(blank)	28	0	18	46
Proven - Investigation Report	22	0	17	39
Not Proven - Closure Report	17	0	11	28
Grand Total	67	0	46	113

The NAVEX substantiation rate benchmark is calculated by dividing the number of overall reports that are substantiated (either fully or partially) by the total number of reports that were closed as substantiated, partially substantiated, and unsubstantiated. In the DRC context, this translates into the number of investigation reports on closed cases divided by the total number of RSMs that were closed as substantiated or unsubstantiated.

DRC’s substantiation rate has increased slightly from 32% in 2018 to 34% in 2019.²² Substantiation, as such, is not the goal for DRC, however, but rather to consistently ensure due process and fair investigations according to DRC’s principled CoCRM framework and Investigation Guidelines. The percentage in substantiation rate can also be misleading, as the difference between the absolute numbers used in the calculation are not that great statistically speaking. Variations between smaller numbers yield more dramatic variations in percentages. Nevertheless, an investigation is a very resource-demanding process that should be administered with care. DRC should therefore seek to analyse and explain if there is a significant drop in substantiation rate and there should be an increased focus on data quality regarding Investigation Outcome.

²¹ The CoCRM standard of proof is the “balance of probability”, which requires the facts to establish a likelihood that the subject committed the suspect misconduct of more than 50%. NAVEX might include data from organisations which use the standard of “beyond reasonable doubt”, which is higher. The concept of “partially substantiated” included in the NAVEX benchmark most likely evens out the issue of different standards of proof in the benchmark.

²² Both the NAVEX method and DRC divides “the number of overall reports that are...substantiated by the total number of reports that were closed as substantiated...and unsubstantiated.”.

5.9. Complaint Processing Time

As in 2018, data has been analysed again this year in relation to the performance benchmark of the total time taken to process an RSM counted in calendar days. The benchmark refers to the time it takes for an RSM to travel from receipt and registration, to Intake Committee response and follow-up measures, to closure in the system. It does not relate to the amount of work hours invested in processing an RSM, only the duration of the process in calendar days elapsed.

The NAVEX benchmark for median processing time is 44 calendar days to fully process a report from receipt to closure. DRC calculates processing time in three ways, using the third as a measure against the NAVEX benchmark: 1) the number of calendar days from the receipt of the complaint and until it has been processed by an Intake Committee (*Table 12*); 2) the number of calendar days between an Intake Committee response to conduct an investigation and the date of the investigator’s final report (*Table 13*); and 3) the number of calendar days passed between the date a complaint has been received and the date the case has been closed in the database. (*Table 14*).

Table 12 shows the number of complaints grouped according to Gate and the number of calendar days passed between the day the RSM was received and the day the Intake Committee met to decide upon a response to the complaint:²³

Table 12

Gate	7 days or less	8-14 days	Over 14 days	Average days	Median
Gate A	117 (24 same day)	20	45	13	4
Gate A+	8 (2 same day)	1	8	23	14
Gate B	92 (9 same day)	32	16	8	6
Grand Total	217 (35 same day)	53	69	44	5

The following table shows, by Gate, the number of calendar days passed between an Intake Committee meeting decision to investigate a case and the completion of the investigation assignment:

Table 13

Gate	30 days or less	Over 30 days	Average days	Median
Gate A	12	26	60	57
Gate A+	0	0	0	0
Gate B	2	16	72	68
Grand Total	14	42	132	58

²³ Excluding complaints with blank data for Intake Date and incoherent date relations between Date Received and Intake Date. Thus, the data for 74 complaints is excluded from calculations in this table.

An increase in the processing time of investigations can be observed since 2018. The increase is most likely a symptom of the increased number of cases investigated and the understanding that investigators have had to conduct multiple and complicated investigations in parallel, resulting in longer calendar day processing times for the individual cases.

The following table shows, by Gate, the number of calendar days passed between the date an RSM has been received and the date the RSM has been closed in the database.

Table 14

Gate	30 days or less	Over 30 days	Average days	Median
Gate A	29	98	101	62
Gate A+	1	2	39	40
Gate B	34	63	58	54
Grand Total	64	163	82	59

The NAVEX benchmark for median processing time is 44 calendar days. NAVEX calculates this according to the number of days passed between the date a report is received and the case is closed. DRC’s comparable median processing time for 2019 is 59 calendar days. DRC’s figure is also calculated according to the number of days passed between the date a complaint was received and the date a complaint was closed in the database. DRC introduced a “Case Closed Date” data field in its database in 2019 to enable the collection of data on the same parameters as NAVEX and there might still be some lack of registration of closing date explaining the difference in processing time. Another explanation is the fact that DRC’s COCRM systems are decentralized meaning that the data is not necessarily comparable with centralized systems in other organisations.

5.10. Losses

The online database requires RSMs to be categorised according to one of three loss types: reputational, financial or a combination of reputational and financial. Registrars can only select one option. Arguably, all suspected misconduct can carry an element of potential reputational and financial loss with it. Accordingly, the type of loss that is ultimately recorded can be subjective. The figures related to financial losses reported below are exclusively related to cases of misuse of DRC funds and other assets, including corruption, fraud and theft.

Extracting accurate data from the database on financial losses related to suspected and proven misconduct was identified as a multifaceted challenge in the Annual Report 2016. The Code of Conduct Database is not a financial tool and has limited capacity to include more sophisticated data. Consequently, it is still not possible to provide reliable figures on actual total losses as a result of misconduct in 2019. The tables below simply show what is registered in the database in 2019, *Table 15* for number of RSMs per type of loss and Gate, *Table 16* for the estimated and actual financial losses in Danish kroner. Some cases are still not concluded

and therefore the actual financial losses are not available. We will endeavour to increase the focus on reliable financial data when it comes to quantifiable financial losses.

Table 15

Type of Loss	Gate A	Gate A+	Gate B	Grand Total
Reputational	144	5	116	265
Reputational & Financial	56	5	15	76
Financial	12	-	3	15
Blank	66	8	14	88
Grand Total	278	18	148	444

Table 16

Gate	Estimated Loss (DDK)	Actual Loss (DDK)
Gate A	248,694	49,696
Gate A+	0	0
Gate B	795,785	0
Grand Total	1,044,479	49,696



6. CAPACITY SITUATION

Additional resources were increased in 2019 at Gate B, enabling the team to better respond to the increased number of complaints received in 2019. The resource allocation at Gate A and Gate A+ according to the required CoCRM staffing setup outlined towards the beginning of the Introduction section of this report is not adequate, meaning that Gate A and Gate A+ Field Teams experience challenges, especially where the number of RSMs received are high.²⁴

Investigation resources were mobilised from Internal Audit, Risk & Compliance and from outside the organisation to help address the capacity gap. In addition, HR and Programme Division capacities were directed towards addressing some of the more systemic challenges DRC faces regarding prevention and detection of misconduct, such as Safeguarding measures in the employment cycle and participation of people of concern in the design, implementation and monitoring of effective CoCRM setups in the many contexts in which DRC operates.

The setup allocated at Gate B in 2019 has been sufficient to manage the increased levels of RSMs DRC continues to receive, in addition to some of the major development tasks mentioned in Key Achievements.

7. SUMMARY OF KEY FINDINGS IN THE DATA

1. The number of RSMs received has increased from 367 in 2018 to 444 in 2019. The absolute number of RSMs concerning sexual misconduct has also increased from 62 in 2018 to 72 RSMs in 2019.
2. Only a few Country Operations still do not record any RSMs. Although it is not always the same Country Operations that fail to register RSMs on the database each year, one Country Operations stand out as having persistent challenges in this regard.
3. More RSMs have been received from beneficiaries in 2019, which is a sign that awareness of the right and access options to complain may be improving on programmes' frontlines.
4. The high number of complaints against frontline staff, managers and support staff continues to be a focus area. Frontline staff is the group most complained about.
5. The high number of complaints against management continues from 2018, where complaints about management in 2019 has gone up from third to second most complained about.
6. The number of cases linked to RSMs received in 2019 that went to investigation has decreased from 168 in 2018 to 146 in 2019. The drop is mainly due to less investigation at Gate A level, where the number of Investigations has gone down

²⁴ See *Table 4* above.

from 134 in 2018 to 83 in 2019, however the number of cases recorded “blank” at Gate A has increased from 23 in 2018 to 67 in 2019.

7. Investigation at Gate B have increased from 34 in 2018 to 60 in 2019.
8. The number of cases referred to management have increased from 119 in 2018 to 146 in 2019.
9. The majority of the subjects complained about are male. This is a highly proportionate number relative to the overall gender split of staff in DRC’s International Operations.
10. Corruption, including fraud, continues to be the most frequent type of misconduct reported.
11. The substantiation rate for investigated cases has increased from 32% in 2018 to 34% in 2019.
12. The processing time for investigations has increased, most likely due to a heavier workload based on an increased number of cases and the fact that investigators have had to manage multiple investigations simultaneously.
13. The tracking of financial losses due to misconduct is not possible in the CoCRM Database and will not be improved until DRC Dynamics is implemented fully.
14. The registration and data quality in the CoCRM database still need to be improved.

8. LESSONS LEARNED

This section reports major lessons learned from activities and interactions taking place outside of and around the processing of complaints. The lessons learned are derived from case handling as well as other organisational processes that, in one way or another, link to the Code of Conduct, CoCRM, and the values, staff and operations of the organisation.

Actions to follow up on the lessons learned are summarized below. Section 9 offers recommendations for tasks to be carried out that are of a more ongoing, day-to-day nature.

1. The current organisational model for the CoCRM is still challenged by high turnover of staff holding key roles, making it difficult to sufficiently maintain quality in related processes. The ability to keep up with onboarding, training and supervision of Intake Committees, Registrars, Authorising Officers and Investigators at Gate A and Gate A+ level is challenged by the very decentralised CoCRM organisational model. Considering the nature of the competencies necessary for administering the CoCRM at country and regional levels, it is difficult to maintain an appropriate level of quality, which in turn is likely to affect due process and result in an undesirable variation in interpretations of organisational values and principles. On the other hand, turnover issues should not make DRC lose sight of the inclusion principle and notably appoint

national staff members at key roles (Intake Committee member, Registrar, Investigator).

2. Training is therefore vital to support the ongoing implementation of the Code of Conduct and CoCRM. The persistent increase in the number of RSMs – in addition to being an indicator of increased awareness of the right and how to complain – is unfortunately also a sign that some DRC staff members and frontline managers do not understand the values of the organisation and how to interpret and enact them in their daily interactions with each other and people of concern. The roll out of online training is anticipated to have impact on the understanding of the values of the organisation, how to interpret and enact them in their daily interactions with each other and people of concern. Online and interactive technical training of Intake Committee members, Registrars, Authorizing Officers and Investigators should be enhanced in the coming year.
3. Due to the Oxfam case there has been an increased focus from Donors regarding reporting, which we have responded to in a more systematic, professional and comprehensive way. This has been a very time-consuming, but necessary task for the team, senior management and for the country operations.
4. Living up to the new GDPR regulations have been on the agenda for not only the Code of Conduct Team, but also for HR and the Legal advisors in HQ trying to get a deeper understanding and being able to apply it also because we are working with third party actors (US, UN) where GDPR does not apply. The work will continue in 2020 and the coming years.

9. RECOMMENDATIONS

The recommendations below are selected from a Capability Analysis identifying minor and major adjustments that would be relevant to implement. The few presented here have been selected to represent the diversity of efforts that are both required and seen as reasonably achievable objectives to reach in practice within a one-year timeframe.

1. Management should ensure that Country Operations and Regional Offices have actions plans to address CoCRM compliance gaps as identified through different Risk assessments (Risk Register, CHS Audits, compliance checks, Code of Conduct Advisory Reports produced through CoC investigations etc.). The standards on communication with and participation of people of concern in CoCRM design, implementation, monitoring and evaluation, and the organisational learning from operating the CoCRM across diverse contexts are certainly relevant areas to prioritise. Management should further ensure that Gate A and Gate A+ levels produce Code of Conduct annual reports to encourage transparency, enhance gaps identification and help improve the CoCRM at all levels.
2. The resource situation at both Gate A and Gate A+ levels should be closely monitored, and efforts should be made to enhance the setup to become more effective, while

also guiding operations on the expected staffing setup to run an appropriate and effective CoCRM. We suggest that key CoC staff have protected employment status or at least longer-term or permanent employment contracts.

3. A special follow-up should be initiated by management with the Country Operations that have persistently not registered any or low numbers of RSMs.
4. The online PSEA training should be finalized and rolled-out in 2020 forming a milestone in DRC's approach to awareness raising, understanding and a cultural change regarding sexual misconduct. The online training should include examples of cases to better illustrate what the organisation considers serious misconduct. Increased levels of transparency would serve well in the area of protection against sexual exploitation and abuse (PSEA), given that examples of unacceptable behaviour are likely to be more understandable than a broad-brush policy document explaining DRC's position against sexual misconduct more generally.
5. The study on a Survivor Centered Approach commissioned by an EU-volunteer forms the foundations for a future formal policy and guidelines on a Survivor Centered Approach in CoC investigations. Donors are also embracing this approach, and this will most probably be a condition for future funding from major donors. A formal policy and guidelines on a Survivor Centered Approach should be rolled-out in late 2020 or early 2021.
6. All documentary resources such as DRC Code of Conduct itself, online training materials and policy papers, should be made available not only in English, but also in French, Spanish and Arabic languages.
7. Organisational focus on corruption and fraud should be enhanced, given that the largest share of RSMs concern that type of suspected misconduct. Inspiration on how to utilise cross-organisational expertise and resources for this purpose can be drawn from the successful and productive cooperation between the HR and the Code of Conduct team around Safeguarding and development of online training packages. Effort should be directed to ensure that the options in DRC Dynamics for analytics and Business Intelligence can be exploited to better prevent and detect potential fraud.
8. Continued focus on data quality for all gates is important and should be monitored regularly, with actions to address poor data quality taken early and frequently.

Following the outbreak of the COVID 19 crisis, DRC has decided to focus on maintaining its Code of Conduct Reporting Mechanism fully alive. For that purpose, the Code of Conduct Team Gate B has issued a guideline to all operations with recommendations with the view to continue upholding the highest standards in the frame of complaints handling as well as to adapt to restrictions of movement implemented by governmental authorities.

As a final remark the Covid-19 has demonstrated that there is a unique opportunity to enhance the communication, training and cooperation with CoC staff in the international operations via online platforms. This opportunity will lead to a profound and positive change in the way we work.



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