DRC CODE OF CONDUCT REPORTING MECHANISM
ANNUAL REPORT 2018

DANISH REFUGEE COUNCIL

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CONTENTS

1. EXECUTIVE SUMMARY

The Danish Refugee Council (DRC) is hereby happy to present its Code of Conduct Reporting Mechanism (CoCRM) Annual Report 2018. 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. It is accompanied by *Annex 1*,[1] which presents the 2019 cross-functional workplan related to HQ-based CoCRM activities aimed at addressing the majority of the challenges identified over 2018 and previous years.

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 2018 in relation to the Code of Conduct and CoCRM. Key achievements focus on cross-organisational initiatives to boost DRC's prevention and detection of, and response to misconduct, such as: 1) through the Executive Management's decision to make the Code of Conduct a global priority for the organisation rather than only an international one; 2) development of stronger policies and toolboxes; 3) engagement within the Safeguarding agenda both internationally and in Denmark; 4) the important, continued focus on transparency around Code of Conduct complaints; and 5) the enhanced engagement in dialogue both internally and with foundations and donors on addressing some of the known challenges with misconduct to improve humanitarian responses.

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 5 February 2019. 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.

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 5.2 from 3.2) and the overall number of reports received (362 up from 212) have increased in 2018 compared to 2017. The steep year-on-year increase in the number of reports of suspected misconduct (RSMs) that DRC witnessed in last year's report thus continued over 2018, with an overall increase of 71%, and respective increases of 84% at the Gate A (Field) level and 47% at Gate B (HQ) level.[2] DRC interprets this as a sign of increased awareness both inside and outside the organisation about

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[1] https://drc.ngo/media/5237368/annex-1-integrated-code-of-conduct-workplan-2019.pdf

[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 and Regional level are referred to as "*Gate A Teams*."

the standards 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 2017 report that numerous Country Operations either did not register any RSMs on the CoCRM database or only did so at the Gate B level persists in 2018.

The capacity situation in relation to the CoCRM's Gate B Team 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 2018. Inspired by these and other lessons learned, Section 9 lists numerous recommendations for CoCRM-related work in DRC over the course of 2019 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 and volunteers 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 four 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 – 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 2018 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 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 2018 and the total number of subjects/cases in 2018, 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 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 Regional levels fall under the category "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 now the second most frequent complainant type. 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 behaviour they can expect from humanitarian organisations and their rights and access options to voice concerns if those standards are not met.

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[3] Cf. *Tables 2-4 & 6* with *Table 7* below.
[4] Cf. *Tables 7-8* with *Table 9* below.

2. The revised and updated CoCRM Operations Handbook was released in mid-2018 with a comprehensive toolbox for International Operations to use. A Compliance Self-Check (CSC) exercise on the six Quality Standards of the CoCRM Operations Handbook was undertaken immediately following its release, covering 38 Country Operations and 111 offices. The CSC showed an overall global CoCRM compliance rate of 73%.

3. Gate B was rightsized with the addition of one full-time staff member to manage the increased workload from complaint intake and case handling.

4. The design and configuration of DRC's new Enterprise Resource Planning (ERP) system, DRC Dynamics, successfully included improved options to record and track financial losses, including those related to fraud and corruption cases.

5. As part of the Open DRC transparency initiative (drc.ngo/about-drc/open-drc), a monthly updated dashboard with key statistics on the CoCRM was published on the DRC website in October 2018 (see the online dashboard, 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.

6. External funding from the Færch Foundation was received late 2018 to strengthen the outreach to frontline staff and people of concern through the development of targeted training packages.

7. Executive Management decided in Spring 2018 to expand the Code of Conduct and CoCRM to include operations in Denmark as well as HQ staff, as part of an organisational focus on creating One DRC. The decision was mainstreamed into the budget process for 2019 and will be implemented over 2019 and 2020.

8. Safeguarding measures throughout the employment cycle were introduced with an accompanying toolbox. A Child Safeguarding Policy was developed and adopted as a component of the increased focus on Safeguarding.

9. DRC participated actively in national and international events related to improving Safeguarding in humanitarian interventions. In Denmark, DRC has been an active participant in the Safeguarding Network managed by Global Focus. Internationally DRC has participated actively in several events, including as an assisting trainer in the CHS organised investigation of sexual exploitation and abuse (SEA) course.

10. 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 related to organisational policies against sexual misconduct for HQ staff, CoCRM-related workshops being part of the annual Head of Programme Network Event, and CoCRM-related discussions forming part of the International Department's Annual Strategic Processes.

11. Successful fundraising for an increased focus on the programmatic side of prevention, detection and response enabled DRC to employ a Participation PhD and a full-time HQ Programme staff member. These capacities have been mobilised within the 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.

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 2018 and a cut-off date of 5 February 2019. One other RSM received in 2018 has been recorded in the database since 5 February 2019. This RSM is not included in the report. The data presented herein reflects a "snapshot" of the data in the CoCRM database as of 5 February 2019. Consequently, the data here may differ from that shown on DRC's public online dashboard (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 2017 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 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 2018; 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.[5] The benchmark variables selected for this year's report are the same as in 2017: 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 2018
Report volume per 100 employees	1.4[6]	5.2[7]
Increase in overall reporting	56% since 2010	226% since 2015 / 71% since 2017[8]
Overall substantiation rate	46%	32%[9]
Median processing time (calendar days)	44	35[10]

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.[11] DRC's volume of 5.2 reports per 100 employees is significantly

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[5] 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.

[6] 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 2018 is 362 RSMs / 6,978 staff members (as of 15 December 2018) * 100 = 5.2.

[7] This figure was 2.9 for 2016 and 3.2 for 2017.

[8] See *Table 2* below.

[9] This year's calculation better follows the NAVEX method for calculating substantiation rate. Last year, DRC took the overall number of substantiated cases it had and divided it by the total number of cases that went to investigation, regardless of whether they were closed at the time of reporting. It also included other data for report types than only investigation reports for substantiated cases and closure reports for unsubstantiated ones. The NAVEX method divides "the number of overall reports that are…substantiated by the total number of reports that were closed as substantiated…and unsubstantiated." Had this method been followed for the 2017 report, DRC's substantiation rate would have been 65% rather than the 45% as was reporting in the CoCRM Annual Report 2017.

[10] See *Table 14* on page 22 below.

[11] 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 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.

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 5.2 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 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 on pages 20-22.

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.[12] 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 2015. *Table 3* provides an overview of the status of RSMs in the CoCRM database as of 5 February 2019.

Table 2

Gate	*2015*	*2016*	2017	2018
Gate A	85	126	137	252
Gate B	26	57	75	110
Grand Total	111	183	212	362

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[12] RSMs are not always investigated. There is a range of options depending on the nature if 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

Rise in RSMs 2015-2018
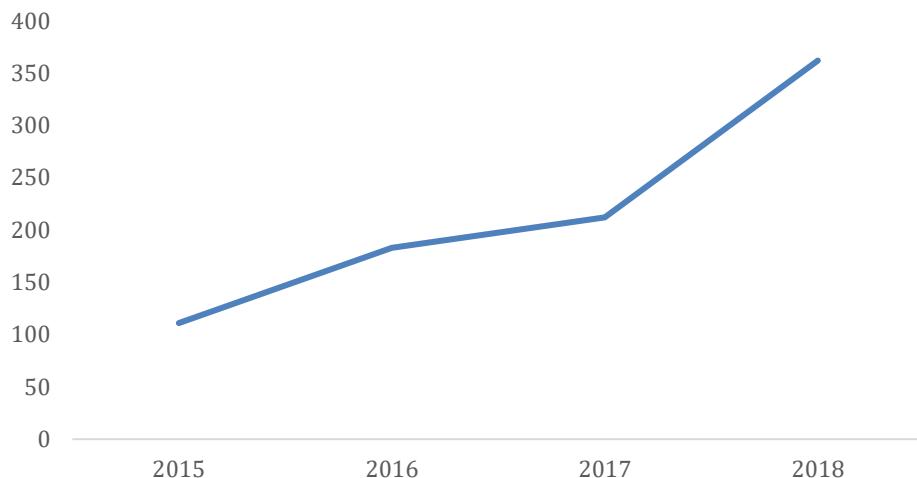
The rise in number of RSMs received between 2017 and 2018 could be an indication that the intake of RSMs is reaching a level more equal to the effort invested into outreach and development. It is, however, not possible to identify the exact reasons for this growth. Moreover, as the report shows in *Table 4* below, there are still numerous Country Operations that do not register any RSMs on the database at all.[13] DRC expects the rise in number of RSMs to increase again 2019. 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[14]	Gate A	Gate B	Grand Total
Open	77	45	122
Closed	175	65	240
Grand Total	**252**	**110**	**362**

The fact that approximately one-third of RSMs received in 2018 are still "Open" in the complaints and case handling process and CoCRM database contributes to the number of gaps in the data at the time of reporting, especially in the area of outcomes.

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[13] See *Table 5* below.
[14] As of 5 February 2019.

5.2. Number of Reports of Suspected Misconduct by Country

Table 4 below presents the number of RSMs registered on the database by Country Operation and Gate.

Table 4

Country	Gate A	Gate B	Grand Total
Uganda	51	5	56
Iraq	35	20	55
Bangladesh	25	9	34
Turkey	18	8	26
Myanmar	20	2	22
Lebanon	21	1	22
Kenya	13	6	19
Somalia	9	6	15
Nigeria	4	11	15
Greece	7	8	15
Syria	3	9	12
Afghanistan	9	2	11
South Sudan	5	5	10
Yemen	6	3	9
Jordan	5	4	9
Central African Republic	5	3	8
Ethiopia	7	-	7
Ukraine	4	-	4
Serbia	2	-	2
Niger	2	-	2
Burkina Faso	1	-	1
Denmark	-	1	1
Tunisia	-	1	1
Kosovo	-	1	1
Djibouti	-	1	1
Senegal[15]	-	1	1
DR Congo	-	1	1
Tanzania	-	1	1
Mali	-	1	1
Grand Total	**252**	**110**	**362**

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

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[15] Senegal hosts DRC's West Africa Regional Office which moved from Ivory Coast in July-August 2018.

Table 5[16]

No RSMs Registered	Registered at Gate B Only
Algeria	Djibouti
Bosnia & Herzegovina (opened in July 2018)	DR Congo
Burundi (opened in August 2018)	Kosovo
Cameroon	Mali
Colombia	Senegal (new Regional Office base)
Georgia	Tanzania
Guinea (opened in March 2018)	Tunisia
Iran (closing March 2019)	
Libya	
Macedonia (closed in December 2018)	
Pakistan (closed in November 2018)	
Sudan	
Vietnam	

It is a concern that 13 Country Operations did not register any RSMs. There could be different resaons for this, including the fact that some of these Country Operations are newly established and have not yet finalised their CoCRM setup and fully defined their workflows, or that they have been in exit mode with very few operational activities and few staff.

That seven 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 Bangladesh, Iraq and Uganda have received a very high number of RSMs in 2018 compared to 2017, going from 0 to 34, 14 to 55, and 13 to 56 respectively. Myanmar and Turkey have also seen significant increases in the number of RSMs registered, going from 1 to 22 and 4 to 26 respectively. 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 2017 and 2018. This may be an indication that capacities, focus and operational conditions (e.g. funding) at Country levels influence the number of reports raised (a good example of this is Bangladesh). Only a few Country Operations seem to consistently register no RSMs at all. Management is recommended to look into these Country

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[16] Despite its appearance in *Table 4*, Denmark is excluded from *Table 5* based on the fact that the Code of Conduct and CoCRM, according to its current status, does not normally apply in Denmark.

Operations in particular: 1) Algeria; 2) Cameroon; 3) Colombia (small operation but currently scaling up); 4 Libya; and 5) Vietnam.[17]

Other Country Operations of concern include Tunisia, DR Congo and Sudan. Tunisia again only registered RSMs at the Gate B level (4 RSMs in 2017 and 1 in 2018). DR Congo did the same (1 RSM in both 2017 and 2018). Sudan registered just 1 RSM in 2017 and did so at Gate B, and registered no RSMs at all in 2018.

5.3. Who is Reporting?

The following table shows data on the types of complainants submitting RSMs registered at Gates A and B respectively in 2018:

Table 6

Complainant Type	Gate A	Gate B	Grand Total
Staff - Current	138	24	162
Beneficiaries	30	10	40
Management	13	25	38
Others	17	20	37
Frontline Staff	31	3	34
Staff - Former	8	19	27
Contractor	8	4	12
Authority	3	2	5
None	2	1	3
IGO (UNHCR)	2	1	3
Implementing Partner	-	1	1
Grand Total	252	110	362

The most notable changes from 2017 is that beneficiaries have gone from being the fifth to the second most frequent complainant type. 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.

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 and B respectively in 2018. 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.

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[17] Neither Macedonia nor Pakistan registered any RSMs in 2017 or 2018. These country operations closed in late 2018, so will not be the target of management follow up in 2019. Iran is closing in the spring of 2019, so will also not be the target of management follow up despite having registered no RSMs in 2018 and just one at Gate B in 2017.

Table 7

Subject Type	Gate A	Gate B	Grand Total
Frontline Staff - Current[18]	138	30	168
Support Staff - Current	84	28	112
Management - Current	31	49	80
Unidentified	14	11	25
Others	12	1	13
Frontline Staff - Former	8	4	12
Support Staff - Former	6	1	7
Implementing Partner	3	1	4
HQ Staff	-	3	3
Management - Former	1	1	2
Grand Total	**297**	**129**	**426**

The high number of complaints against management continues from 2017, but this year the frontline staff is the group most complained about (39% of the total, up from 30% in 2017), whereas complaints about management has dropped from first to third most complained about (19% of the total, down from 32% in 2017). The high number of complaints against managers, support staff (26% of the total, up from 19% in 2017) and frontline staff continues to be a concern.

5.5. Subject Gender

Table 8

Gender	Gate A	Gate B	Grand Total
Male	120	91	295
Female	58	18	76
Unknown	35	20	55
Grand Total	**297**	**129**	**426**

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. The figures show that the majority of subjects, 69%, are male. The proportion of male staff (expats and national staff) in DRC's International Operations is 68%, which points to a highly proportionate relation between staff gender and subject gender. The four most typical subjects according to 2018 data are:

- #1 – Current Frontline Staff, Male
- #2 – Current Support Staff, Male
- #3 – Current Management, Male
- #4 – Current Frontline Staff, Female

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[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.

5.6. Types of Suspected Misconduct

The following table shows data on the types of suspected misconduct registered at Gates A and B respectively in 2018, 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	Gate A	Gate B	Grand Total
Corruption[20]	149	44	193
Other	58	25	83
Abuse of Authority	57	25	82
Workplace Harassment	38	15	53
Sexual Harassment	13	30	43
Sexual Exploitation & Abuse (SEA)	6	22	28
Theft	22	3	25
Assault	6	5	11
Violence	8	2	10
Not Applicable	8	-	8
Unspecified	4	-	4
Retaliation	1	2	3
Blank	18	1	19
Grand Total	**388**	**174**	**562**

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; 2) abuse of authority; and 3) workplace harassment. If, however, one combines suspected misconduct tags of sexual harassment and SEA into a single sexual misconduct category of misconduct, then this type of suspected misconduct ranks third for frontline staff and workplace harassment fourth.

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; 2) abuse of authority; and 3) sexual harassment, followed closely by workplace harassment.

The types of misconduct in relation to which current management staff most often find themselves subject of an RSM are, in descending order: 1) abuse of authority; 2) corruption; and 3) workplace harassment. This is consistent with findings in 2017, although in 2017 the order of corruption and workplace harassment were the reverse – that is, workplace harassment was the second mostly likely form of misconduct management staff was the subject of and corruption was the third.

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[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 (543 not including blanks) does not therefore correspond to the number of RSMs received (362) and subjects suspected (426).

[20] DRC's definition of corruption includes fraud.

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 "Other" can reflect of number of things. "Other" 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 5 February 2019, 62 RSMs received during 2018 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 19 of these, whereas Gate B registered 43. The 62 RSMs received and registered in relation to sexual misconduct in 2018 represent a significant increase to the 39 received and registered in 2017, and the 17 received and registered in 2016. RSMs related to sexual misconduct over the past three years have more than tripled. 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), it is 17% (62 RSMs out of 362 total) in 2018. Sexual harassment as a distinct form of sexual misconduct was linked to 9% of RSMs in 2017 and 12% in 2018. SEA was linked to 10% of RSMs in 2017 and 8% in 2018.

DRC launched 27 investigations into suspected sexual misconduct over the course of 2018. Seven of these investigations substantiated the suspected sexual misconduct. Of the remaining 20 investigations, ten remained open as of 5 February 2019, ten 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 one concluded in an investigation report that proved minor misconduct, not the suspect sexual misconduct. The substantiation rate on closed cases related to investigations into sexual misconduct in 2018 is 40%. Each of the seven cases of substantiated sexual misconduct lead to the subject of the investigation being dismissed by DRC. 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 eventually experience a drop in the number of RSMs related to sexual misconduct – not because of underreporting, but because this form of misconduct is being effectively combatted by the organisation.

Image 2

Suspected Misconduct Type

Legend:
- Corruption
- Other
- Abuse of Authority
- Workplace Harassment
- Sexual Harassment
- SEA
- Theft
- Blank
- Assault
- Violence
- Not Applicable
- Unspecified
- Retaliation
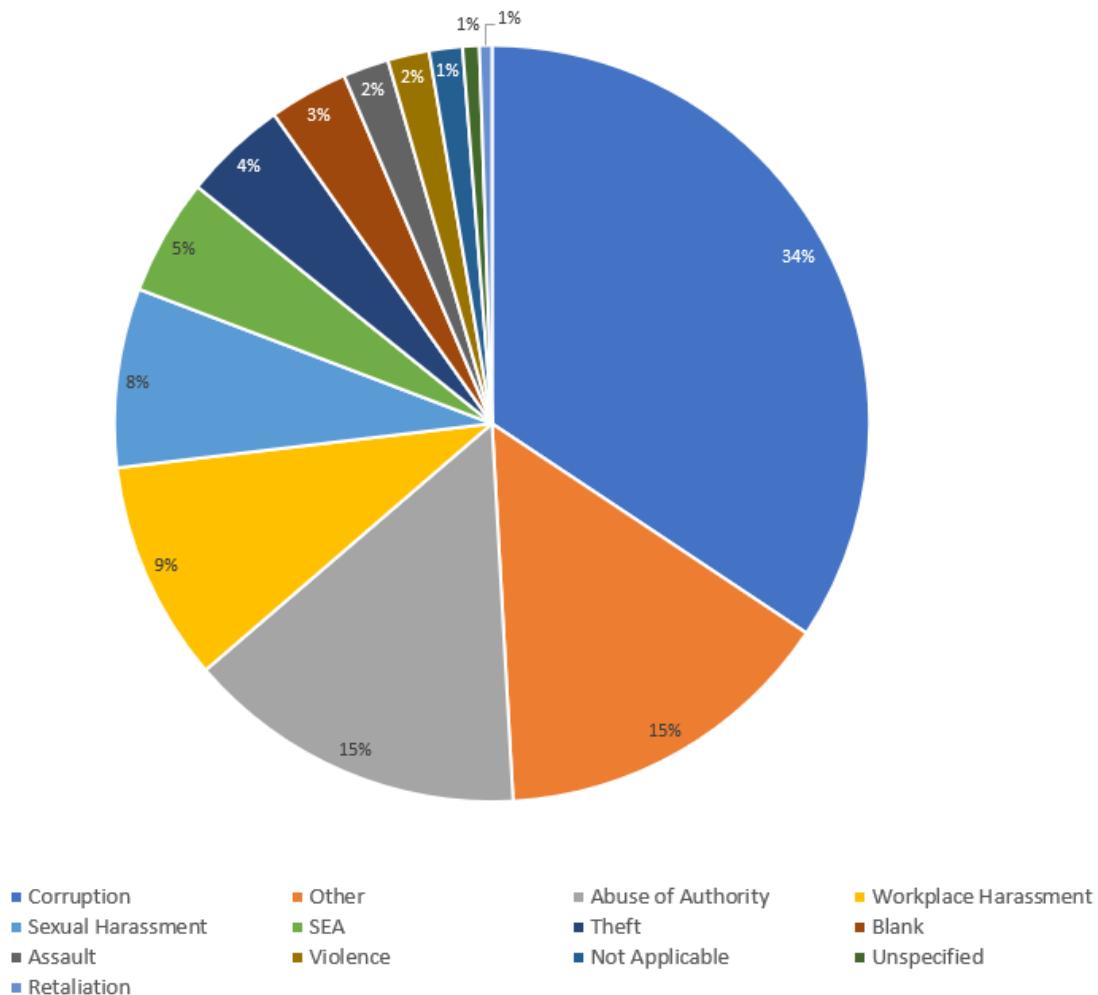
5.7. Intake Committee Response

All RSMs are processed by Intake Committees at either 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 426 cases opened in 2018 as a result of RSMs, Intake Committees decided on investigation as the appropriate response in 168 cases (39% of the time).[21] "Other" is indicated when an Intake Committee outcome does not correspond with any of the seven standard options according to which an Intake Committee may decide. "Pending Intake Response" means that an Intake Committee meeting response for a given complaint registered in the database had not yet been entered, either because the meeting had not yet been held or the data had simply not been entered as of 5 February 2019. "Blank" denotes blanks in the data set.

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

Table 10

Intake Response	Gate A	Gate B	Grand Total
Investigation	134	34	168
Referral to Management	79	40	119
Record for Information	20	26	46
Pending Intake Response	5	13	18
Other	8	4	12
Preliminary Assessment	9	2	11
Case Suspended	6	4	10
Referral to Another Organisation	4	4	8
Contractual Referral to HR	5	1	6
Referral to Regional CoCRM	3	-	3
Referral to Country CoCRM	1	-	1
Blank	23	1	24
Grand Total	297	119	426

The percentage of cases linked to RSMs received in 2018 that went to investigation according to Intake Committee responses recorded as of 5 February 2019 is the same as it was it 2017, at 39% of all Intake Committed response data in the database. The number of cases referred to management increased in 2018 from 2017, however, from 21% to 28%. 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. It is therefore reasonable to conclude that DRC processed proportionately more of these types of reports in 2018.

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

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[21] 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.

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.

Because the Intake Response tag of "PA" is overwritten in the database when an ultimate Intake Committee response is determined, DRC tracks whether a PA has been conducted by a distinct data field. Thus, the figures for the number of PAs conducted in 2017 and 2018 presented here in this paragraph will differ from those indicated in *Table 10* above and on page 15 of the 2017 report. In 2017, 42 cases out of 237 went to PA, or 18%. In 2018, 65 cases went to PA, or 18%. The rate of preliminary assessments carried out in 2017 and 2018 is thus consistent. In 2017, 19 of the 42 PAs (45%) ultimately went to investigation. In 2018, as of 5 February 2019, 23 of the 65 PAs (35%) went to investigation.

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).[22] A closure report means that the case was unsubstantiated (not proven). "Other/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.

Table 11

Investigation Outcome	Gate A	Gate B	Grand Total
Investigation Report	32	8	40
Closure Report	58	11	69
Investigation Pending	8	4	12
Other/Blank	36	11	47
Grand Total	134	34	168

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 dropped significantly from 65% in 2017 to 32% in 2018.[23] Substantiation, as such, is not the goal for DRC, however, but rather to consistently ensure

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[22] 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.

[23] This year's calculation better follows the NAVEX method for calculating substantiation rate. Last year, DRC took the overall number of substantiated cases it had and divided it by the total number of cases that went to investigation, regardless of whether they were closed at the time of reporting. It also included other data for report types than only investigation reports for substantiated cases and closure reports for unsubstantiated ones. The

due process and fair investigations according to DRC's principled CoCRM framework and Investigation Guidelines. The percentage drop 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 the drop in substantiation rate.

5.9. Complaint Processing Time

As in 2017, 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 (i.e. management decision). 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, that has either been investigated or referred to management, and a management decision being made in relation the complaint, regardless of "open/closed" status 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:[24]

Table 12

Gate	7 days or less	8-14 days	Over 14 days	Average days	Median
Gate A	123 (46 same day)	24	38	10	4
Gate B	66 (7 same day)	17	20	12	8
Grand Total	**189 (53 same day)**	**41**	**58**	**10**	**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:

NAVEX method divides "the number of overall reports that are…substantiated by the total number of reports that were closed as substantiated…and unsubstantiated." Had this method been followed for the 2017 report, DRC's substantiation rate would have been 65% rather than the 45% as was reporting in the CoCRM Annual Report 2017.
[24] 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.

DANISH
REFUGEE
COUNCIL

DANISH
DEMINING
GROUP

Table 13

Gate	30 days or less	Over 30 days	Average days	Median
Gate A	23	40	63	43
Gate B	2	12	58	59
Grand Total	**28**	**52**	**60**	**46**

An increase in the processing time of investigations can be observed since 2017. The increase is most likely a symptom of the increased number of cases investigated and the understanding that investigators have had to conduct multiple 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 a complaint has been received and management decisions being made in relation to open and closed 2018 complaints that have either been investigated or referred to management:[25]

Table 14

Gate	30 days or less	Over 30 days	Average days	Median
Gate A	42	56	98	40
Gate B	6	6	29	29
Grand Total	**48**	**62**	**52**	**35**

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 2018 is 35 calendar days, down from 36 in 2017. DRC's figure is calculated according to the number of days passed between the date a complaint was received and a management decision was made in relation to complaints that have either been investigated or referred to management. Not every complaint is investigated or referred to management, however, so DRC's median processing time will likely be lower if one accounts for other Intake Committee responses. DRC has introduced a "Case Closed Date" data field in its database to enable the collection of data on the same parameters as NAVEX. DRC's ambition is to meet or beat best practice processing times of 30-32 days when accounting for all the different ways DRC processes RSMs according to respective Intake Committee responses.

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. Aside from DKK 65,000 linked to a blank misconduct type, the figures

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[25] Excluding complaints & cases with blank data for management decision date and incoherent date relations between date received and management decision date (including zeros). Thus, the data for 87 cases is excluded from calculations in this table.

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. However, it has become increasingly clear that this issue will not be solved before DRC's new ERP system, DRC Dynamics, has been fully implemented during the course of 2019. The ERP system will allow the recording and segregation of different loss types globally across the organisation. Consequently, it is still not possible to provide reliable figures on actual total losses as a result of misconduct in 2018. The tables below simply show what is registered in the database in 2018, *Table 15* for number of RSMs per type of loss and Gate, Table 16 for the estimated and actual financial losses in Danish kroner.

Table 15

Type of Loss	Gate A	Gate B	Grand Total
Reputational	118	57	175
Reputational & Financial	66	43	109
Financial	32	1	33
Blank	36	9	45
Grand Total	**252**	**110**	**362**

Table 16

Gate	Estimated Loss (DDK)	Actual Loss (DDK)
Gate A	1,009,135	595,018
Gate B	-	-
Grand Total	**1,009,135**	**595,018**

6. CAPACITY SITUATION

The number of complaints received in 2018 continued to be disproportionate to the staff resources available to optimally respond, even though additional resources were added at Gate B. The resource allocation at Gate A according to the required CoCRM staffing setup outlined towards the beginning of the Introduction section of this report is unknown, but it is likely that Gate A Field Teams experience similar challenges to Gate B, especially where the number of RSMs received are high.[26]

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.

It is unlikely that the resource situation will ever be one of over-capacity. Consequently, in the autumn of 2018, a model for re-organisation of the intake and response setup was developed with the aim of clarifying roles, improving consistency and routines, and utilising of resources across organisational entities better. The initial model was presented to the International Department's Extended Senior Management Group (E-SMG) in September. The direction of the model was approved with a request that evidence for the resource setup at Field level be presented at the March 2019 E-SMG meeting for a final decision to be taken later in 2019.

The setup planned and allocated at Gate B in 2019 is expected to be sufficient to manage the increased levels of RSMs DRC continues to receive, in addition to some of the major development tasks (see *Annex 1 CoCAR2018 – Integrated CoC Workplan 2019* for more details).[27]

7. SUMMARY OF KEY FINDINGS

1. The number of RSMs received has increased by more than 70% since 2017. The absolute number of RSMs concerning sexual misconduct has increased, but is proportionate to 2017 relative to the total number of RSMs received.
2. Almost a third of all 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, a few Country Operations stand out as having persistent challenges in this regard.

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[26] See *Table 4* above.

[27] https://drc.ngo/media/5237368/annex-1-integrated-code-of-conduct-workplan-2019.pdf

3. More RSMs have been received from beneficiaries in 2018, 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 managers, support staff and frontline staff continues to be a concern. Frontline staff are now the staff group most complained about.

5. 69% 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 which is 68% male, 32% female.

6. Corruption, including fraud, continues to be the most frequent type of misconduct reported.

7. Intake Committee referrals to management have proportionately increased in 2018, while the percentage of preliminary assessments conducted remains stable.

8. The substantiation rate for investigated cases has dropped.

9. 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.

10. The tracking of financial losses due to misconduct will not be improved until DRC Dynamics is implemented fully.

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 summarised in _Annex 1_ to this report that describes major cross-organisational initiatives linked to the Code of Conduct and CoCRM.[28] Section 9 offers recommendations for tasks to be carried out that are of a more ongoing, day-to-day nature.

1. Through DRC's International Position Evaluation (IPE) process managed by HR over 2017 and 2018, it became apparent that most frontline staff are supervised by a group of managers with a very distant connection to the organisation. As such, these managers are not appropriately equipped to represent and convey the tone from the top in the frontline of programme activities. Most complaints concern frontline staff and the second most frequent complainant type are beneficiaries. Thus, clearly more focus should be put into training, mentoring and capacity-building of frontline managers to represent and communicate the values of the organisation, and to manage their staff accordingly. This was a recommendation in the 2017 report as well,

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[28] https://drc.ngo/media/5237368/annex-1-integrated-code-of-conduct-workplan-2019.pdf

and initiatives have been set in motion over 2018 towards meeting this recommendation.

2. Following constructive feedback from a complainant regarding a report of alleged sexual misconduct, the Gate B Team has revised its standards for interacting with potential survivors of sexual misconduct. Some of the changes that have been introduced as a result of the feedback received include a more survivor-centred approach based on better communication, more clarity and information about opportunities for well-being support, and more facilitation of access to the right to interim measures.

3. The current organisational model for the CoCRM is 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 level is challenged by the very decentralised CoCRM organisational model, as the number of people to be trained and supervised by the Gate B staff is overwhelming. Considering the nature of the competencies necessary for administering the CoCRM, it is unrealistic in the current setup 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.

4. Training is 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 too many DRC staff members 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.

5. The potential move away from the current CoCRM database was postponed due to DRC Dynamics' implementation and the accompanying stretch on relevant capacities. Instead, efforts were made in other ways, including the addition of a dedicated data and document quality assurance resource at HQ and preparations made for adjustments to the database to be implemented in early 2019. These changes have already been implemented at the time of reporting, with practical guidance and walkthroughs for Registrars and Authorising Officers as concerns the relationship between complaints and case handling in practice on the one hand, and the interaction points of this process with the database on the other. Roles and responsibilities have also been further clarified, as have the expected interpretations of the data fields in the online tool.

9. RECOMMENDATIONS

The recommendations below are selected from a longer list of identified 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 have actions plans to address CoCRM compliance gaps as identified though Compliance Self-Checks. 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. A special follow-up should be initiated by management with the Country Operations that have persistently not registered any RSMs over the past years.

2. Continued focus on data quality for Gate B is important and should be monitored regularly, with actions to address poor data quality taken early and frequently. The CoCRM database should be included as a project in the wider digitalisation effort at organisational level. The drop in the substantiation rate should be further investigated and the option of using various Intake Committee responses other than investigation should be promoted when investigation is clearly not the appropriate response to a given RSM. The resource situation at both Gate B and Gate A levels should be closely monitored and efforts should be made to streamline the setup to become more effective, while also guiding operations on the expected resource setup to run an appropriate and effective CoCRM.

3. Transparency on Code of Conduct cases should be expanded to 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. Transparency should be linked to the development of a training strategy to better motivate the level of detail and type of communication around such issues, and learning activities should be set in motion.

4. 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 PSEA. 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.

As a final remark for 2018, it is important to say that the recommendations from previous years are naturally still valid, and some of them correlate with the recommendations listed above. As described in _Annex 1_ _CoCAR2018 – Integrated CoC Workplan 2019_,[29] DRC is making concerted efforts to implement the recommendations according to a manner in which long-lasting effects will be realised and mainstreamed into regular business processes.

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[29] https://drc.ngo/media/5237368/annex-1-integrated-code-of-conduct-workplan-2019.pdf

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If you want to submit a report of suspected misconduct, please write to:
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https://forms.drc.dk/view.php?id=6091