

DanChurchAid

Complaints Report 2025



DCA Strategy and Quality Management Unit
May 2026

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Abbreviations

CAR: Central African Republic

CHS: Core Humanitarian Standard

CoC: Code of Conduct

CoPs: Communities of Practice

DCA: DanChurchAid

DR Congo: Democratic Republic of Congo

FAFPI: Fight Against Facilitation Payments

HR: Human Resources

MEAL: Monitoring, Evaluation, Accountability and Learning

MFA: Ministry of Foreign Affairs

NCA: Norwegian Church Aid

NGO: non-governmental organisation

ProLog: Procurement and Logistics

PSEAH Policy: Prevention of Sexual Exploitation, Abuse and Harassment Policy

SOP: Standard Operating Procedure

SQM: Strategy and Quality Management

1. Executive Summary

DanChurchAid (DCA) is dedicated to fostering a safe, inclusive and respectful environment by addressing violations of its Code of Conduct (CoC) and related policies while reinforcing its integrity commitments. In 2025, the DCA in-house Whistleblower Scheme became fully operational alongside its existing Complaints System. DCA also updated its CoC, adding a clause on declaring conflict of interest in procurement and recruitment. Additionally, the mandatory courses on the DCA CoC, Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH), and reporting channels available on the FABO internal e-learning platform, were all translated to French and Arabic.

In 2025, 67 complaints were submitted through the DCA Head Office complaints system (20 operational and 47 sensitive). In the same year, DCA handled a total of 65 sensitive complaints through its Head Office reporting channels (the DCA Complaints System and the DCA Whistleblower Scheme). This figure represents all sensitive cases that fell within the scope of the two systems and were processed accordingly. This number is consistent with the past three years. This suggests that DCA's reporting channels may have reached a mature level, supported by ongoing policy improvements and awareness-raising initiatives across the organisation.

This report focuses on complaints received through the DCA Complaints System, with section 4.6 providing an overview of the cases handled under the Whistleblower Scheme. Corruption-related complaints were the most prevalent, accounting for 75% of sensitive complaints handled within the DCA Complaints System, and breaches of the PSEAH Policy represented 11%. This data reflects both the ongoing challenges in maintaining ethical standards and the positive impact of DCA's continued investments in prevention, training and accountability mechanisms. Strengthening the culture of reporting and trust remains essential to ensuring a safe and respectful environment for all stakeholders. In 2025, DCA finalised the Survivor Assistance Guidance and Survivors' Fund Procedure Manual, reinforcing its survivor centred approach. As a result, the fund was activated to support survivors of one SEAH complaint reported through the DCA Complaints System.

In 2025, DCA country offices received 3,480 operational complaints, a decrease from 2024 (4,312 operational complaints). This decrease can partly be attributed to US funding cuts, and deteriorating security in some countries, such as the M23 crisis in DR Congo. Most of the complaints received by the country offices were requests for support or minor operational issues.

Aligned with the Core Humanitarian Standard (CHS), DCA supports its partners in establishing their own complaints systems. The number of partners with a complaints system in place slightly dropped from 119 in 2024 to 116 in 2025. Partners reported 12,666 complaints, an increase of 12% from 2024 (11,364), indicating consistent use of the complaints tracker and strengthened partner capacity to document and manage complaints.

2. About the Report

DanChurchAid's (DCA) vision is to create a safe, inclusive and respectful environment for everyone by reacting to any breach of the DCA Code of Conduct and related policies, and by preventing any abuse or violation of the ethical commitments stated in the CoC and related policies. DCA's action to prevent and protect community members, employees and anyone else impacted by DCA's activities is guided by the principles of zero tolerance for any abuse or violation of the CoC and related policies, the 'do no harm' principle and a survivor-centred approach, confidentiality and accountability. DCA recognises that this is a collective effort where the organisation, partners and individuals can contribute.

This 21st edition of the DCA Complaints Report reaffirms DCA's commitment to transparency, accountability and learning from reacting to and preventing misconduct, abuses and corruption.

This report focuses on the data from complaints received through the DCA Complaints System. Only Section 4.6 provides an overview of the cases handled under the Whistleblower Scheme. The data collected in 2025 will be presented and discussed together with new initiatives implemented and planned for 2026 as part of DCA's continuous commitment to improving its efforts to prevent and address abuses and misconduct.

2.1 Introduction to DCA's Complaints System

DCA uses the ACT Alliance's definition of a complaint: "a specific grievance of anyone who has been negatively affected by the organisation's action or who believes that the organisation has failed to meet a stated commitment. Grievances are typically between the employee and the employer".

In November 2024, DCA launched a new reporting portal with two channels where complaints and whistleblower cases can be submitted. The new portal was designed to the highest standards of confidentiality and to internalise the whistleblower scheme that was previously managed by an external consultancy firm. The internal whistleblower system, managed by the Investigations Advisor, became fully functional in 2025.

DCA's two separate channels are:

- **Whistleblower scheme** is for submitting sensitive complaints and is for all current and former DCA employees. A whistleblower report typically concerns matters of a serious nature and in the public interest, such as criminal offences, corruption, sexual exploitation, breaches of law or serious violations of DCA personnel policies.
- **Complaints system** is the system that external parties – such as people supported by DCA, partners and vendors – use when making sensitive and operational complaints. It is also used by current and former DCA employees for making operational complaints. An operational complaint is typically a complaint about the quality of DCA's work.

The main differences between the complaints and whistleblower systems are explained in a mandatory training for all DCA employees.

DCA differentiates between operational and sensitive complaints:

- **Operational complaints** relate to service delivery issues such as the quality, efficiency or effectiveness of humanitarian aid. Examples include complaints about

delays in assistance, insufficient aid distribution or discrimination in service provision.

- **Sensitive complaints** involve serious misconduct such as fraud, corruption, sexual exploitation and abuse, harassment, discrimination or other breaches of the Code of Conduct.

Complaints can be reported to DCA in multiple ways to ensure that all the allegations, both operational and sensitive, are captured in a centralised complaints system. In addition to the two reporting channels available at Head Office, DCA country offices and partners manage their local complaints system, with channels including in-person reporting, hotlines, complaint boxes, and other locally accessible options. The multiple-entrance system ensures complainants can use the channel they trust and can access most easily. Operational complaints are mainly handled at DCA country offices or by DCA's partners, who are close to where the humanitarian aid is delivered and hence best suited to assess and react to grievances related to the quality or effectiveness of the project's activities. Chapter 5 describes data coming from DCA country offices and DCA's partners.

Operational complaints linked to fundraising activities such as telemarketing and parish collection, which take place in Denmark, are typically received through the complaints system at the Head Office and handled by the DCA Engagement Department. More details can be found in Section 4.5. Sensitive complaints are handled at the Head Office and can be reported through the complaints or whistleblower portals.

Similar to previous years, the main part of this report is dedicated to sensitive complaints received and handled at the Head Office by the Accountability and Complaints Advisor in consultation and collaboration with the Complaints Committee and colleagues at the country offices where the misconduct occurred. The Complaints Committee is composed of the International Director, the Head of the Strategy and Quality Management Unit, the Accountability and Complaints Advisor, and relevant Finance, Human Resources (HR) or Procurement and Logistics (ProLog) colleagues when needed and depending on the nature of each complaint.

Each country office has a complaints focal point who is in charge of the country office complaints system and responsible for collaborating with the Head Office on prevention measures, training and compliance with auditors' requirements.

On an annual basis, a quality assurance exercise is conducted in which several sensitive complaints are randomly selected and reviewed to assess the process and decisions made during complaints handling. This annual review of the DCA complaints system helps ensure that complaints are managed diligently and in line with DCA's organisational values. As of 2025, this quality assurance exercise is carried out by an external consultant.

DCA ensures transparency and compliance with donor requirements by timely reporting of allegations and informing the donors about investigation outcomes. Each allegation is assessed against donor requirements and reported accordingly.

3. Scope and Limitations

The DCA Complaints Report does not provide descriptions at the level of individual complaints, cases or country-specific data. Rather, the focus is at the global and Head Office level for sensitive complaints received throughout the year, analysis of data and trends.

DCA operates in Denmark and 19 other countries. However, the data in this report only covers Denmark and 17 other countries, as Malawi and Zambia are part of joint country programmes with Norwegian Church Aid (NCA) and led by NCA. Therefore, complaints received in these countries are handled through NCA's complaints system.

The crisis in the Democratic Republic of Congo (DR Congo) significantly affected the duration of several investigations. Between January and March 2025, the M23 rebel advance around and capture of Goma led to the evacuation of most employees. This situation disrupted communication and delayed all investigation processes until April 2025. In addition, a transition in the complaints focal point role further complicated progress. Investigations resumed in June 2025 once the new focal point was appointed.

4. Complaints Received in 2025

4.1. Complaints Received through the Head Office Complaints System

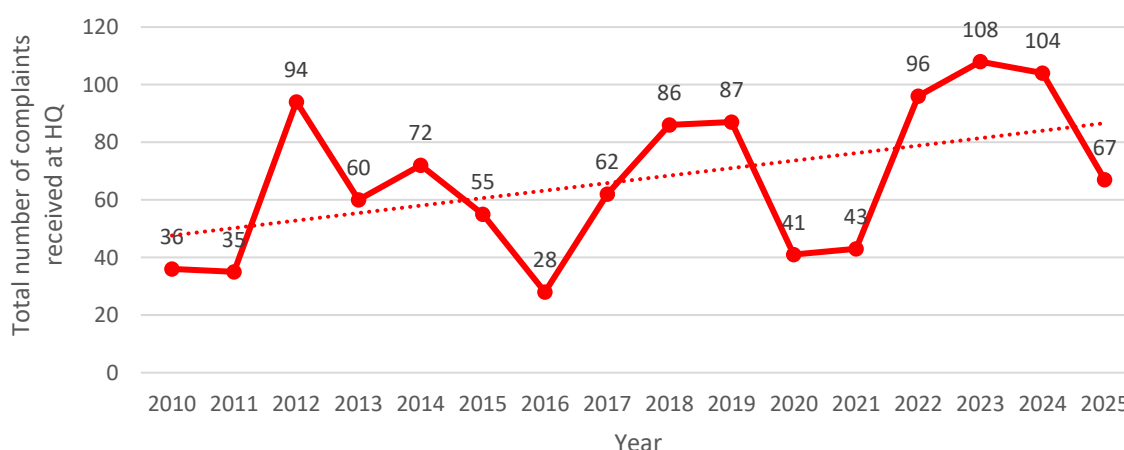
In 2025, DCA received 67 complaints submitted through the Head Office complaints system, comprising 20 operational complaints and 47 sensitive complaints. Among the 47 sensitive complaints, 11 were referred to the whistleblower scheme, as they were reported by current or former employees (their data is included under section 4.6).

As shown in Figure 1, the number of complaints received has been steadily increasing since 2021. In 2025, the number of complaints registered in the DCA complaints system decreased following the launch of the DCA Whistleblower Scheme. This decline does not indicate that concerns are no longer being raised; rather, current and former DCA employees are increasingly using the Whistleblower Scheme to report serious concerns in the public interest (see section 4.6). This is coupled with the efforts made to ensure that minor workplace issues are first presented to management and/or HR

DCA's efforts to enhance awareness of zero tolerance for any misconduct at all levels and to improve knowledge and accessibility of the complaints system will continue. DCA believes that prevention and response to misconduct are long-term commitments that require constant and collective efforts.

Figure 1: Complaints received at DCA Head Office throughout the years

Source: DCA's complaints system 2025



The following section focuses on the 56 complaints received by the Accountability and Complaints Advisor through email and the complaints system portal.

Table 1 and Table 2 differentiate between operational and sensitive complaints. The operational complaints are referred to the country office or to colleagues at the Engagement Department if related to their area of work (the data of operational complaints coming from Denmark is included under section 4.5). Examples of operational complaints referred to country offices include HR related issues, community members requesting support, suppliers or partners not satisfied with contracts or Cooperation Agreements, or DCA staff behaviour not classified as a sensitive complaint (i.e. issues related to communication and management). The sensitive complaints were handled at the Head Office and included breaches of the CoC or related policies such as the Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH Policy), Anti-Corruption Policy or the Child Safeguarding Policy.

Table 1 (See Annex 1) illustrates the number of complaints received per month, differentiating between operational and sensitive complaints. The number of complaints received varied from a maximum of 11 in March to only one in July. The average number of complaints per month is 4.6.

The peak in complaints received in March could be explained by the launch of the new complaints and whistleblower portals at the end of 2024 and the related mandatory training and awareness raising that followed in the first quarter of 2025.

Table 2 (See Annex 1) presents the categories of original complainants, differentiated by sensitive and operational complaints. Out of 56 complainants, five were current DCA employees, a significant decrease from the 25 staff complainants recorded in 2024. This reflects the appropriate use of the new reporting channels, where DCA employees are required to use the Whistleblower Scheme for reporting sensitive cases.

Two complainants were anonymous; a decrease compared to four in 2024. DCA does not encourage anonymity in reporting a complaint, mainly because the lack of information can hamper an effective investigation.

In total, eight sensitive complaints were filed by community members, both people supported and not supported by DCA, and 10 operational complaints were reported by community members. DCA's efforts will continue to address barriers to reporting – such as fear of retaliation, lack of trust, social and cultural stigma, accessibility and perceived inaction of previous complaints – by continuing to work on information sharing and community engagement to build trust in the communities that DCA and its partners work with.

Most operational complaints were received from community members not supported by DCA, mirroring the data from 2024. Similar to the data from 2024, seven complaints were submitted by 'other external stakeholders'. Taken together with complaints from community members not supported by DCA and from various external actors, such as suppliers and donors, this indicates increased accessibility of the complaints system for people outside DCA, who are the intended primary users of the system. The highest number of sensitive complaints was submitted by DCA implementing partners (8 complaints).

It is worth noting that in 16 of the 36 sensitive complaints (44%), the complaint was submitted on the DCA complaints system portal by a different person on behalf of the original complainant: eight by the focal point in the country office, five by a DCA management employee (i.e. the country director after the issue was brought to their attention) and three by

another DCA programme employee. This finding is encouraging because DCA is relying upon its employees to report suspicions of misconducts in the field and remote areas. This also reflects that DCA employees use and trust DCA's complaints system, which is essential to ensure that it is adequately promoted within the organisation.

Receiving complaints is viewed as a positive indication that stakeholders trust DCA with their grievances on sensitive issues. Furthermore, it indicates that country offices are becoming more effective at communicating the right, and opportunity, to report complaints to employees, partners, and people supported by DCA.

Table 3 (See Annex 1) shows complaints received at Head Office, by country, and the distribution of sensitive and operational complaints. The highest number of operational complaints was received from Denmark equal to six, followed by four complaints from Ukraine. The Head Office receives few complaints because operational complaints are mainly received and addressed by country offices, which are best suited to address complaints related to the quality of the services provided by DCA. (Refer to the chapter '5. Complaints Received by Country Offices in 202' for more details regarding this data.)

Table 3 also shows that three operational complaints were received from Morocco, which were mainly requests for support; yet, these were considered outside the scope of DCA since DCA does not operate in Morocco.

The highest number of sensitive complaints was received from DR Congo with seven complaints, followed by Kenya, Syria and Ukraine with four complaints each, reflecting the same pattern seen in 2024. Palestine and Nepal were the only countries where DCA is operating but no sensitive complaints were registered or received through the DCA complaints system in 2025.

The number of sensitive complaints per country is influenced by different factors such as the number of community members reached by DCA operations, the number of DCA employees per country, instability in the country context, cultural and social perceptions of corruption or abuses. International indexes on corruption and reported cases of sexual exploitation, abuse and harassment in different countriesⁱ can also be used as indicative references against which to evaluate the complaints reported for each country.

Where relevant, investigations recommend measures to strengthen DCA's capacity to detect misconduct early and reduce the likelihood of wrongdoing. The relevant line manager is responsible for addressing the Complaints Committee's recommendations. The Accountability and Complaints Advisor follows up and informs the Complaints Committee on the status of addressing the recommendations.

4.2. Sensitive Complaints Received through the Head Office Complaints System

Sensitive complaints are those which imply a suspected breach of DCA's CoC and related policies – Anti-Corruption Policy, PSEAH Policy and Child Safeguarding Policy. As shown in Figure 2 (See Annex 1), DCA received 36 sensitive complaints in the DCA complaints system in 2025, compared to 56 in 2024.

As illustrated in Table 4, the type of misconduct that was most complained about in 2025 has remained breaches of the Anti-Corruption Policy (19 complaints in 2025 compared to 21 in

2024). Eight other complaints were also linked to Anti-Corruption and other types of misconduct. Altogether, complaints related to breaches of the Anti-Corruption Policy amounted to 27, representing 75% of the total sensitive complaints received in the DCA complaints system.

Breaches of the PSEAH Policy account for one complaint in 2025 compared to eight in 2024. In addition, three complaints related to a breach of the PSEAH Policy and the CoC, compared to one in 2024. DCA views the reporting of sexual exploitation, abuse and harassment as a positive indicator of increased awareness of unacceptable staff behaviour and the understanding of that everyone has the right and responsibility to contribute to DCA's integrity efforts. While fewer SEAH-related complaints were submitted through the DCA complaints system in 2025, this should not be interpreted as a decline in incidents or reporting. Employees and community members are continuously encouraged to report concerns through ongoing awareness-raising efforts, and some SEAH-related concerns are now channelled through the Whistleblower Scheme instead of the Complaints System.

Table 4: Types of sensitive complaints

Source: DCA's complaints system 2025

Type of misconduct	Number of complaints
Breach of Anti-Corruption Policy	19
Breach of Anti-Corruption Policy and procurement guidelines	4
Breach of CoC	3
Breach of CoC and Anti-Corruption Policy	4
Breach of CoC and PSEAH policy	3
Breach of CoC and recruitment guidelines	2
Breach of PSEAH policy	1
Grand total	36

Table 5 (See Annex 1) shows categories and number of Subjects of Concern (SoC), the person accused of wrongdoing, among the 41 SoCs identified across the 36 sensitive complaints reported in 2025. As in 2024, the majority of SoCs in 2025 were DCA employees (13 programme, 10 operations and three management employees), and the second-highest number of SoCs were from DCA's partner organisations.

Figure 3 and Figure 4 (See Annex 1) show, respectively, the gender of the complainants and SoCs for sensitive complaints. As in 2024, males constituted the majority of SoCs (26 male SoCs in 24 complaints), while the number of complainants was the same for males and females (16 each), with four complaints where the complainant's gender was unspecified. In 2024, most of the complainants were males (35 males, compared to 10 females and 11 unspecified).

The more balanced distribution of complainants in 2025 may indicate progress in addressing some of the barriers that women and girls often face when accessing and trusting complaints

mechanisms. Social norms, stigma, fear of retaliation, and concerns about confidentiality can discourage women from reporting, particularly in sensitive complaints. Through ongoing awareness-raising efforts, DCA continues to encourage both employees and community members to report concerns, and the improved gender balance among complainants suggests that some of these barriers may be gradually diminishing.

DCA commits to addressing complaints in a timely manner and strives to conclude investigations as quick as possible without compromising accuracy.

The duration of an investigation depends on case complexity, the availability of evidence and witness cooperation. Organisational resources – including the country office Complaints Focal Points’ workloads and access to information – also impact timelines. Other forces that can delay investigations include turnover of employees involved in the investigation and external factors such as security risks, conflicts that led people to flee or legal constraints. In 2025, several investigations were delayed due to the crisis in the DR Congo. The M23 rebel advance around and capture of Goma led to the evacuation of most employees between January and March, disrupting communication and halting investigations until April 2025. A subsequent transition in the complaints focal point role caused further delays, with investigations resuming in June 2025 once the new focal point was appointed.

Table 6 (See Annex 1) provides an overview of the status of the 36 sensitive complaints in DCA’s database as of 17 March 2026. The majority of sensitive complaints from 2025 (81%) were closed at the time of the annual report, contrasted to seven complaints that remained open. Among the seven open complaints, three were received in the last quarter of the year.

According to DCA’s standard operating procedures (SOP) for case handling, all sensitive complaints are received by the Accountability and Complaints Advisor, who presents and provides recommendations to the Complaints Committee. The Committee is the decision-making authority at DCA in charge of deciding investigations strategies, approving the investigation final report and deciding on consequent measures, recommendations and follow-up actions.

Table 7 shows that of the 36 sensitive complaints handled within the complaints system in 2025, 20 were investigated, representing 56% of all complaints, compared to 94% in 2024. The 11 complaints referred to the internal whistleblower scheme are included in the table because they were initially received through the complaints system, although they were not processed within it. Four complaints were referred to country office management for handling (compared to 0 in 2024), with follow-up from Head Office to ensure appropriate action was taken. Three complaints were suspended (compared to two in 2024) due to insufficient information or inability to reach the complainant. In addition, four complaints were referred to the relevant partner organisation for investigation, as the partner had an effective complaints mechanism in place and the allegations concerned a partner employee member. The range of responses applied in 2025 reflects recommendations from the external review of the complaints system, which advised broadening the available response options beyond formal investigations to allow for less bureaucratic yet still effective approaches to determining whether a complaint is substantiated.

Table 7: Overview of the Complaints Committee response to the sensitive complaints received in 2025

Source: DCA’s complaints system 2025

Complaints Committee response	Number of complaints
Case suspended	3
Investigation	20
Recorded for information	3
Referred to Country Office Management	4
Referred to Head Office Management	1
Referred to HR in Head Office	1
Referred to partner for their investigation	4
Sub total	36
<i>Referred to internal whistleblower scheme</i>	<i>11</i>
Grand total	47

Investigations can be lengthy, and professionally conducted investigations generally require significant time. Their duration could be reduced with additional investigative capacity in DCA country offices, an area DCA has prioritised since 2023 through the training of additional investigators. Table 8 presents the processing time for the 17 complaints that were investigated and closed in 2025, measured as the number of calendar days between receipt of the complaint and closure in the database. Three complaints reported in 2025 remain open and under investigation and are therefore not included. Of the 17 completed investigations, seven complaints (41%) were closed within less than 90 days, which is the recommended timeline to complete investigations (compared to 85% in 2024). The remaining 10 complaints (59%) took more than 90 days to be concluded and closed, largely due to case complexity, availability of witnesses and documentation, and, in 2025, significant delays linked to the security situation in DR Congo. As described earlier, the crisis in DR Congo temporarily halted investigations, contributing to the increased proportion of complaints exceeding the recommended timeline.

Table 8: Overview of the processing time of the sensitive complaints received in 2025

Source: DCA's complaints system 2025

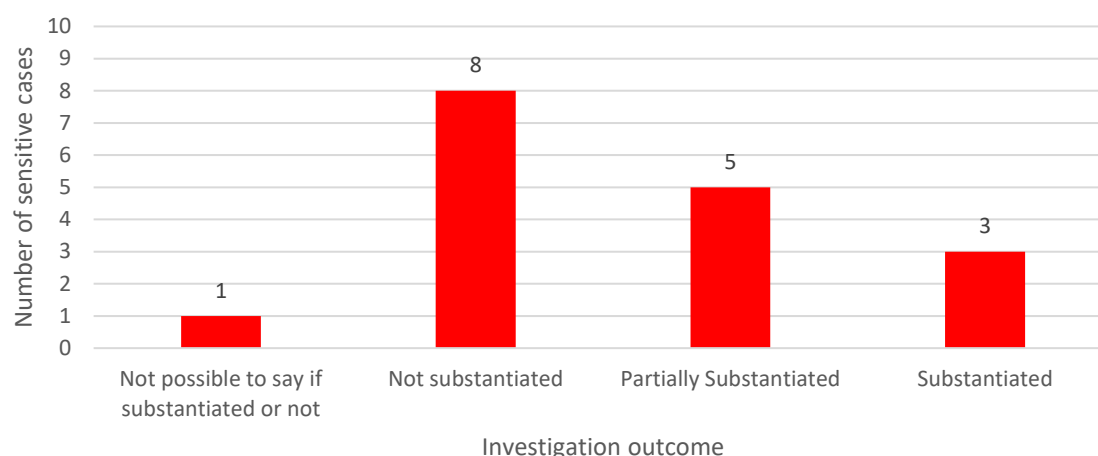
Processing time	Number of sensitive complaints	Percentage of sensitive complaints
30 days or less	4	23.5%
30 to 60 days	1	5.9%
60 to 90 days	2	11.8%
More than 90 days	10	58.8%
Grand total	17	100%

Figure 5 shows the investigation outcome for the 17 complaints that were investigated and closed. Similar to 2024, the number of complaints that were not substantiated are the most prevalent with eight complaints, compared to three where the allegations were substantiated.

The allegations were found partially substantiated in five complaints (similar to the data from 2024), and in one complaint, it was not possible to say if they were substantiated or not. An investigation may end without a clear finding when evidence is insufficient, testimonies conflict or key parties are unavailable.

Figure 5: Overview of the investigation outcomes for sensitive complaints in 2025

Source: DCA's complaints system 2025



Misconduct can cause different kinds of losses and risks to DCA. DCA considers that a reputational risk has occurred when news about a case or an ongoing investigation is spread by news outlets or social networks. Financial losses occur when funds have been misused and were not returned to DCA by those responsible for the misconduct.

Table 9 (See Annex 1) shows that out of the 17 closed sensitive complaints that were investigated in 2025, four led to financial losses, compared to three in 2024, and one complaint led to reputational risks (0 were recorded in 2024).

4.3 Complaints About Corruption

Table 10 (See Annex 1) presents the types of corruption-related complaint reported in the DCA complaints system in 2025. Several complaints related to breaches of the Anti-Corruption Policy contained multiple allegations, reflecting the often interconnected nature of corrupt practices. The figures in the narrative therefore refer to the number of allegations, not the number of individual complaints. Fraud and embezzlement remained the most prevalent type of corruption with 12 complaints in 2025 compared to 22 in 2024. Allegations of nepotism and favouritism increased again, rising to 12 in 2025 (from two in 2024). Allegations of bribery also increased, doubling from three complaints in 2024 to six in 2025. As shown in Table 10, these allegations were distributed across 27 individual complaints.

Table 11 (See Annex 1) provides an overview of corruption-related complaints by country. DR Congo remained the country with the highest number of corruption-related complaints, reporting seven complaints in both 2025 and 2024, indicating a persistent concentration of risk. Kenya and Syria followed with four complaints each in 2025. Kenya also had a high number of complaints in 2024 (five complaints), while CAR, which recorded seven complaints

in 2024, matching DR Congo that year, saw a significant decline to just one complaint in 2025. These variations suggest differing risk dynamics across country offices and may reflect changes in operational context, reporting practices, or the effectiveness of mitigation measures.

The countries with a high number of complaints match those with a high corruption index in the Corruption Perception Index 2025ⁱⁱ.

Similar to 2024, DCA did not receive complaints about facilitation payments. Facilitation payments – small unofficial payments to expedite services – are widespread in regions with weak governance and high bureaucracy. While no complaints have been reported in DCA's operations, such practices are known to exist in the humanitarian sector. Their presence poses ethical and legal risks. DCA is committed to raising awareness among employees about the need to report them.

DCA believes that more should be done to increase awareness of facilitation payments and the need to report them. DCA is a member of the Fight Against Facilitation Payments Initiative (FAFPI) which aims to collect data about facilitation payments and increase reporting. In 2025, DCA contributed to a FAFPI pilot project by conducting a survey in DR Congo, with the aim of understanding the practices and delivering a dedicated training to sensitise the employees on the matter (see section 10).

Similarly, no complaints involving gifts, or tipping off as a type of corruption were reported in 2025. Tipping-off means disclosing to any other person, information or any other matter, which is likely to prejudice an investigation.

4.4 Complaints About Sexual Exploitation, Abuse and Harassment

This section addresses complaints related to sexual exploitation, abuse and harassment, which fall under the category of sensitive complaints. These complaints require special attention due to the involvement of a survivor. Every time DCA addresses a complaint related to sexual exploitation, abuse and harassment, it conducts an assessment of the survivor's needs and addresses those needs.

In 2025, DCA received four complaints related to sexual exploitation, abuse, and harassment, compared to nine in 2024. This decrease does not necessarily indicate fewer incidents or reduced reporting. Rather, SEAH complaints are increasingly being reported directly through DCA's Whistleblower Scheme, which employees are now encouraged to use for such allegations. As a result, fewer SEAH complaints are channelled through the complaints system, even though this reporting channel remains active and accessible for all external parties.

Figure 6 (See Annex 1) illustrates the breakdown of sexual exploitation, abuse and harassment complaints by country, with the highest number of two complaints reported in Ukraine (compared to four in DR Congo in 2024).

Of the four sexual exploitation, abuse, and harassment complaints received in 2025, one complaint was suspended due to limited information and lack of responsiveness from the complainant, and one was referred to country office management for follow up because the survivor did not provide consent for a formal investigation.

An investigation was conducted and concluded in two complaints. The investigations

concluded that the allegations were substantiated in one complaint and not substantiated in the second complaint. The duration of the investigations varied: one complaint was concluded in less than 30 days, while the second exceeded 90 days.

In 2025, all SoCs in the SEAH complaints reported were DCA programme employees. In contrast, the SEAH complaints reported in 2024 showed a broader distribution: while programme employees accounted for the majority (five complaints), additional allegations involved individuals in management positions as well as employees from DCA implementing partners.

DCA prioritises the investigation of sexual exploitation, abuse and harassment complaints over other categories. However, investigations are often hampered by unavailability of evidence and elapsed time between the incident and its reporting. The need to avoid further harm to the survivor also presents challenges when balanced with the necessity of sharing details with witnesses to gather more information or with the subject of concern to confront them with the facts and allowing them to present exculpatory evidence.

The investigations are survivor centred, prioritising their safety, dignity and well-being. It ensures that survivors are heard, respected and involved in decisions affecting them while minimising harm and re-traumatisation. This approach builds trust and supports ethical, accountable outcomes.

4.5 Operational Complaints in Denmark

The operational complaints received in Denmark through the complaints system and handled at the Head Office are shown in Figure 7 (See Annex 1). These complaints relate to the activities carried out in Denmark by DCA, mainly consisting of fundraising activities and the management of the second-hand shops which is done with the support of volunteers.

A total of six complaints were received in 2025 compared to 13 in 2024. This decrease could reflect an improvement of employee and volunteer behaviours and attitudes in dealing with customers in the DCA second-hand shops and during the fundraising activities.

The breakdown of complaints related to DCA's work in Denmark is shown in Figure 8 (See Annex 1). In 2025, two complaints were related to WeFood or second-hand shops (compared to five in 2024), two complaints to telemarketing, and one complaint each to parish collection, and webshop. The findings reflect that in 2025 fewer complaints came from people who wished to be taken off the call-lists (telemarketing/SMS) and these were addressed. Most of the inquiries about data protection are not actual complaints, but instead sent via DCA's data protection email address (dataprotection@dca.dk) handled by the DCA Digital & Insight unit. These inquiries are related to data subjects making use of their "right to be forgotten". Complex issues are escalated to DCA's Data Protection Consultant in the Strategy and Quality Management (SQM) unit. DCA ensures its commitment to transparency when it comes to data protection breaches. No breaches of high risk for individuals affected were registered in 2025.

It should be noted that many of the operational complaints in Denmark do not come through the complaints system. They are received and handled elsewhere such as in the shops or at the telemarketing department in Aarhus. These complaints are tracked by the Engagement Department in Head Office. In total, two operational complaints related to volunteers or prices in the stores, were received and handled directly at the stores in Denmark and therefore not included in the six complaints shown in the graph. Last year, the number of complaints directly

handled by the Engagement Department was five.

DCA addressed all operational complaints received in Head Office and strived for a constructive dialogue with all complainants. All complaints were addressed, and the complainants received a response from relevant employees in DCA.

4.6 Whistleblower Scheme Cases

The DCA Whistleblower Scheme was launched in November 2024 and has now completed its first full year of operation in 2025. The introduction of this additional reporting channel has further reinforced DCA's commitment to accountability, integrity, and transparency across all areas of our work.

DCA's Whistleblower Scheme provides a secure, independent, and confidential channel for individuals with a work-related connection to report serious concerns without fear of retaliation. Reports may relate to serious violations such as fraud, corruption, abuse of power, safeguarding concerns, or other breaches of law and internal policies. Safeguards are in place to protect the identity of whistleblowers and to ensure that all reports are handled with due diligence, impartiality, and respect for all parties involved.

In 2025, DCA's Whistleblower Scheme received a total of 37 reports via the official portal, including the 11 complaints that were referred from the DCA complaints system. Of these, eight cases were assessed as falling outside the scope of the scheme and were subsequently referred to other relevant units or mechanisms within the organisation. These referrals reflect a commitment to ensuring that all concerns raised are appropriately addressed through the correct pathways. The cases falling outside the scope of the scheme reflect that there remains a need for further guidance and information on what constitutes a whistleblower matter.

Table 12 illustrates the categories of allegations received and handled in the DCA Whistleblower Scheme, after removing the eight cases falling outside its scope. As shown in Table 12, a broad range of serious misconduct was reported in 2025. While fraud and related offences constituted most cases received, the diversity of categories represented indicates that the Whistleblower Scheme is being used to raise concerns about multiple risk areas within DCA. This is a positive indicator as it aligns with the purpose of the scheme which is to welcome the reporting of all forms of serious misconduct or suspected serious misconduct.

Table 12: Categories of allegations received in the DCA Whistleblower Scheme

Source: DCA Whistleblower Scheme 2025

Category of Allegation	Number of Cases
Violations of Danish Law	1
Fraud & Related Offences	7
Financial Misconduct	1
Abuse of Power	6
Corruption & Related Offences	4
Sexual Harassment, Abuse & Exploitation	4
Serious Breaches of DCA's Policies	5

Conflict of Interest or Nepotism

1

Total Cases

29

Table 13 provides an overview of the number of cases that have been attributed to DCA country offices in 2025. This data shows cases were received from 11 countries over the last year, demonstrating that the scheme is being utilised across multiple operational and culture contexts.

While some countries are not represented in the table, this may reflect a variety of factors, including both positive indicators as well as potential gaps in awareness. This highlights the need for continued efforts to strengthen communication and understanding of the scheme in underrepresented locations.

Differences in the number of reports between countries are to be expected, as they reflect variations in programme size, complexity, organisational structure, as well as local cultural and geographical contexts.

Table 13: Overview of the cases received in the DCA Whistleblower Scheme by country 2025

Source: DCA Whistleblower Scheme 2025

Country	Number of Cases
DRC	8
Lebanon	4
Ukraine	3
Mali	3
South Sudan	2
Syria	2
CAR	2
Sudan	2
Ethiopia	1
Denmark	1
Nepal	1
Total Cases	29

Overall, the first full year of implementation of the Whistleblower Scheme has been positive, with indicators suggesting that it has begun to fulfil its purpose as a trusted and effective reporting channel within DCA. At the same time, 2025 has highlighted the need for continued efforts in training and awareness-raising to ensure that the scheme is understood and utilised to its full potential across the organisation.

As 2026 progresses, focus will remain on ensuring that all whistleblower reports are handled consistently, impartially, and with the diligence they require. Protecting whistleblowers remains at the core of the scheme, alongside strengthening confidence in the system.

5. Complaints Received by Country Offices in 2025

DCA country offices have local complaints handling mechanisms in place, which can receive both operational and sensitive complaints. Offering different channels (i.e. hotline, complaints boxes) to submit complaints guarantees widespread access to the complaints system, tailored to the context and the needs of the communities. Country offices report sensitive complaints to the Head Office; they handle operational complaints in-country.

Operational complaints may come from people supported by DCA, employees or other stakeholders and often highlight concerns about efficiency, fairness or the impact of programmes. Addressing operational complaints helps improve accountability, effectiveness and trust in the organisation's work.

Figure 9 (See Annex 1) shows that country offices received 3,480 operational complaints in 2025, compared to 4,312 in 2024. The decrease in complaints in 2025 can partly be attributed to the cuts in US funding, which in turn, resulted in fewer support and assistance-related complaints across several countries. DR Congo illustrates this trend clearly: the country was affected both by the funding cuts and the M23 crisis, which significantly reduced staffing levels and operational reach. As a result, operational complaints in DR Congo dropped from 1,406 in 2024 to 852 in 2025.

The Quarterly Complaints Reporting Template compiled by the country offices provides information about the categories of complaints (Table 14) and the reporting channels (Table 15). The complaints tracker and reporting template was introduced in 2023.

Table 14 (See Annex 1) provides an overview of all complaints received in country offices, including those related to violations of DCA's CoC and policies (i.e. incidents of sexual exploitation and abuse, fraud and corruption, etc.) [category 5], which were initially received in country but referred to Head Office for handling. Table 14 shows that most complaints in 2025 were related to requests for assistance (44.3%), followed by request for information (30.1%), including clarifications on eligibility criteria, cash assistance schedules, activities schedule and enrolment status. In 2024, the percentages for these two categories were, respectively, 36.4% and 24.9%.

Table 15 (See Annex 1) shows the different channels used by complainants to report operational and sensitive complaints.

As of 2023, DCA country offices began tracking the channels through which complaints were received to better understand which mechanisms communities use most and to monitor the accessibility and effectiveness of the available channels. Similar to the findings from 2024, the three most-used channels in 2025 were direct communication with employees (34.3%), the DCA hotline (30.5%), and DCA complaints boxes (11%). No complaints were received through social media channels in 2025. For the first time, however, 7.8% of complaints were referred by another NGO. This increase is largely linked to a specific arrangement in one country office where all beneficiaries were required to submit complaints through a centralised system managed by the Ministry of Social Affairs, which then recorded and forwarded complaints to the relevant organisations.

The 2025 data highlight the effectiveness of dedicated channels that ensure confidentiality and timely responses, particularly hotlines, direct communication, and complaints boxes. The continued use of these channels reflects DCA's commitment to providing accessible,

context-appropriate information and multiple entry points into the complaints system, ensuring communities can raise concerns safely and reliably.

6. Partners' Complaint Systems and Complaints Received

DCA works with partners who have deep knowledge of their communities and contexts to strengthen local ownership, sustainability and impact. DCA supports these partners to become strong, independent and accountable civil society actors. Handling complaints is part of DCA and its partners' shared commitment to better serve community members. It helps ensure accountability, uphold integrity and continually improve the quality of support provided.

DCA has collected and analysed data about complaints received by partners since 2021 to get a full overview of complaints related to all activities supported by DCA. Over the years, DCA has supported its partners in developing effective and accessible complaints systems. At the country level, DCA's Complaints Focal Points are responsible for collecting data from the partners and submitting the Quarterly Complaints Reporting Template. This system guarantees a constant flow of communication about complaints and allows DCA to monitor the effectiveness of partners' complaint systems and provide support when needed. The Quarterly Complaints Reporting Template was introduced in 2023. With continued capacity-building efforts, partners demonstrated clear improvements in both tracking and reporting throughout 2024 and 2025.

Out of the 228 partners DCA collaborated with in 2025, 116 (51%) had a complaints system in place. This represents a decrease compared to 2024 (59%), partly due to partner turnover as some organisations phased out and new ones joined during the year. However, the absolute number of partners with functioning complaints systems remained relatively stable (116 in 2025 compared to 119 in 2024), while the overall number of partners increased in 2025 (228 compared to 210 in 2024). DCA is continuously supporting old and new partners to ensure they have effective complaints systems in place, reflecting DCA's continued efforts to strengthen partners' complaints systems following a recommendation from the Core Humanitarian Standard (CHS) audit. Country offices are actively assisting partners without existing mechanisms to set them up, while recognising that some partners face barriers such as limited financial and human resources or technical expertise. DCA will therefore continue to provide tailored support to partners committed to developing their own complaints systems.

Figure 10 (See Annex 1) shows the number of complaints received globally by partners each year since 2021, with a continued upward trend. In 2025, partners reported 12,666 complaints, an increase of 12% from 2024 (11,364). This rise suggests that partners are consistently using the complaints tracker and reporting template, demonstrating sustained engagement with the system. It also reflects the impact of DCA's ongoing capacity-building and accountability efforts, which have strengthened partners' ability to document, manage, and report complaints reliably over time.

Table 16 (See Annex 1) presents the categories of complaints received by partners in 2025. The total number of complaints in the table does not fully match the overall number of complaints reported by partners because one country office was unable to provide a category breakdown for 10 of its cases.

The findings show that requests for support and assistance (37.7%) and requests for information (36.8%) were almost equally represented in 2025. This marks a shift from 2024,

when requests for support and assistance dominated at 58%. Minor operational complaints increased from 10.2% in 2024 to 13.4% in 2025, while major operational complaints rose sharply from 0.7% to 11.9% over the same period. Suggestions for improvements were recorded by some partners under minor operational complaints [category 3] and appreciation and compliments were included under [category 1].

Complaints related to violations of partners' codes of conduct or related policies remain low, which may indicate under-reporting. It is also important to note that DCA receives sensitive complaints about partners directly through its own system, which may further explain the low numbers reported by partners. Barriers to reporting complaints are higher when the matter is sensitive and people fear retaliation, stigma and not being believed. Sensitive complaints often involve personal trauma, making disclosure emotionally and socially risky. The low number of sensitive complaints about the violation of the partner's code of conduct and policies [category 5] raises attention about possible barriers in terms of awareness and accessibility of the partners' complaints systems. DCA is committed to continue supporting its partners to make their complaints systems accessible and raise awareness in the communities.

Table 17 (See Annex 1) shows an overview of the different channels through which complaints were reported to partners, where the total number of complaints received through the different channels was also lower than the total numbers of complaints received by partners in total. This is because a few partners did not submit information on the channels used. These partners required additional time and support to build their capacity in this area. This gap was particularly significant in one country, where all its partners, who collectively received 4,846 complaints, were unable to provide a breakdown by reporting channel. DCA country offices have flagged this as a key challenge and will continue to support these partners throughout 2026 to ensure more complete and accurate reporting.

Similar to the findings from 2024, the most-used reporting channels in 2025 continue to be partners' hotlines (54.9%), followed by direct communication (21.8%), and office walk-ins (12.1%). This shows that the partners' hotline numbers are visible and accessible to community members, however, a good percentage of complainants or persons submitting feedback prefer to do it in-person.

7. Challenges and Improvements Among DCA Country Offices and Partners

Since 2023, qualitative questions have been added to the Annual Country Programme Reports to capture the country offices' perspectives about the main improvements and challenges with their local complaints system or partners' complaints systems.

Challenges

Across both 2024 and 2025, several challenges consistently affected the functioning of local complaints mechanisms. The most persistent issues related to partner capacity, community awareness, and operational constraints. As in 2024, partner capacity and compliance remained a central challenge in 2025. Many partners still lacked fully functional complaints systems, standardised tools, or trained focal points, resulting in inconsistent documentation, delayed reporting, and gaps in follow up. Limited financial and human resources further constrained their ability to manage sensitive or complex cases.

Community awareness and trust also remained uneven, with cultural norms, fear of retaliation, and low literacy continuing to discourage reporting, particularly for sensitive complaints. In areas with high illiteracy or limited phone networks, communities relied heavily on reactive, in person channels, reducing the reach of the mechanism.

Operational and contextual barriers seen in 2024 were again prominent in 2025. Insecurity, restricted access, weak communication networks, difficulties maintaining contact with complainants, and high workloads slowed down the collection, transmission, and closure of complaints. In some contexts, centralised government run systems reduced DCA's direct access to complaints and delayed timely responses.

However, financial and human resource limitations, both within DCA country offices and among partners, along with employee turnover and the absence of dedicated complaints personnel among partners became more pronounced during the reporting period. Overall, while complaints mechanisms remained operational, the main challenges continued to centre on ensuring consistent quality, accessibility, and timely follow-up across diverse contexts and partners. Strengthening partner capacity and expanding community awareness of the local complaints systems therefore remain key priorities moving forward.

Improvements

Despite the challenges, both country offices and partners made notable progress in 2025 in strengthening the local complaints systems during the reporting period. Country offices focused on improving accessibility, documentation, and oversight, with a deliberate effort to strengthen information sharing in most of the country offices and ensure communities were clearly informed about DCA and the available complaints channels. Several offices expanded or refined their complaints systems by introducing standardized reporting templates, improving the use of the checklist for partners' complaints systems to identify gaps, and enhancing follow-up with partners. Awareness-raising efforts were intensified through posters in local languages, community meetings, and clearer communication on available channels. In some contexts, new or improved channels—such as hotlines, complaint boxes for mobile teams, and plans for toll-free numbers—helped increase visibility and accessibility. Better documentation and analysis also enabled offices to use community feedback more systematically to inform program adjustments.

Among partners, capacity strengthening remained a central area of improvement. Many partners received refresher trainings on accountability and complaints handling, which improved case management, and the use of standardised tools. Several partners updated or introduced complaint trackers, designated focal points, and adopted DCA's templates where their own systems were not yet fully developed. Visibility materials and safeguarding posters were translated and widely displayed, contributing to greater community awareness about the available channels. In some countries, partners began adding new reporting channels such as toll-free numbers or dedicated email addresses, while others improved their internal procedures and referral pathways for sensitive complaints.

Overall, these efforts contributed to stronger, more accessible, and more consistent complaints systems across country offices and partner organisations. Continued investment in partner capacity, community awareness, and harmonisation of processes will remain essential to further strengthening accountability in the coming year.

8. Focus Areas 2025

In 2025, DCA continued strengthening integrity at all organisational levels. Many initiatives were taken, such as the launch of the in-house whistleblower scheme, the internal stock-take of the Complaints System and Whistleblower Scheme, the update of the DCA CoC and the translation of mandatory trainings. Some activities started in 2023 have continued, such as quarterly webinars and Complaints Reporting Template, enhancing data sharing and communication flow with country offices and partners, as well as the submission of the annual report on Sexual Abuse and Harassment (SEA) cases to ECHO.

Coordination and synergy between the Complaints System and the Whistleblower Scheme

Throughout 2025, DCA continued strengthening the coordination and synergies between the Complaints System and the Whistleblower Scheme. This work built on the launch of the new reporting portal in late 2024. During the year, the portal's features for both complaints and whistleblower cases were assessed and adjusted where needed to improve usability, case handling, and internal coordination. Awareness-raising efforts also continued, ensuring that employees, partners, and community members understood the purpose of both systems and how to access them safely.

An internal stock-take of the Complaints System and Whistleblower Scheme was carried out by the Head of SQM, focusing on identifying best practices and areas for improvement and improving efficiency given the current available resources in both Head Office and country offices. The exercise resulted in a set of short-, medium-, and long-term recommendations, which DCA has begun implementing. These improvements will start to be reflected in 2026.

In parallel, work was ongoing to strengthen the procedures for handling complaints within the DCA Complaints System, based on the recommendations from the quality assurance exercise conducted by an external consultant during the same year. This independent review assessed the alignment of DCA's complaints handling process with internal policies and international standards, and provided six recommendations to enhance operational performance and system coherence. These findings are now informing DCA's continuous improvement efforts with regards to complaints handling.

Development and updates of related policies and procedures

The DCA Code of Conduct (CoC) was updated in September 2025 based on discussions with the HR unit in Head Office. The revision entailed a minor addition (clause 15 in the new version) to emphasise the importance of employees declaring conflict of interest/personal relationships when such situations arise, as it has been a recurring issue. This was coupled with a declaration form now available on DCA Intranet to be used for such incidents in recruitment and procurement.

In alignment with DCA's survivor-centred approach and with the aim of strengthening the organisation's capacity to respond to survivors' needs, the Survivor Assistance Guidance and the Survivors' Fund Procedure Manual were finalised and launched in 2025:

- The Survivor Assistance Guidance outlines preparatory steps to be taken at the country-office level to ensure support for survivors of sexual exploitation

and abuse.

- DCA established a dedicated Survivors' Fund in 2025, and the accompanying Procedure Manual sets out the circumstances under which the fund can be activated and the types of services it may cover. During the year, the fund was activated to support survivors of one SEAH complaint reported through the DCA Complaints System, enabling them to access services to address the emotional and psychological impacts of the harassment and exploitation they experienced.

To ensure broad awareness and uptake, the Survivor Assistance Guidance and the Survivors' Fund Procedure Manual were presented to Senior Management, Country Directors, colleagues in the International Department at Head Office, and Accountability and Complaints Focal Points. These sessions aimed to familiarise employees with the new guidance and manual and reinforce DCA's commitment to providing timely, appropriate, and survivor-centred support.

Learning and capacity strengthening

In 2025, the mandatory courses on the DCA Code of Conduct, DCA's Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), and DCA Reporting Channels, which were updated or developed in 2024, were translated into Arabic and French. This expansion aimed to increase accessibility and reach across country offices, helping ensure high completion rates and consistent understanding of DCA's safeguarding and accountability standards.

In addition, the Introduction to the Core Humanitarian Standard on Quality and Accountability training, developed by the CHS Alliance in 2025 to reflect the updates made in the CHS 2024, was made available on FABO. This advanced course complements the short DCA CHS Essentials course revised in 2024. The short course remains part of DCA's onboarding package and is mandatory for all employees, ensuring that every new colleague is introduced to the core principles of quality, accountability, and responsible humanitarian action.

A refresher investigation training was delivered in 2025 for DCA employees in country offices and at Head Office who had previously been trained in conducting investigations into fraud and sexual exploitation, abuse and harassment. The aim was to ensure that employees retained the necessary knowledge and skills, and to provide an opportunity for those who had not recently applied their skills in practice to refresh their competencies, so they remain prepared to support future investigations. The training was conducted remotely by an external consultancy firm, and 18 DCA employees successfully completed the course.

Due to unforeseen developments in 2025, the Accountability and Complaints Advisor was unable to carry out the planned support visits to DR Congo and Syria/Iraq. These included the USAID funding cuts resulting in a temporary pause on all travels, the escalation of the M23 crisis in DR Congo leading to a suspension of activities, making travel impossible. And as well as the deteriorating security situation in Syria. The visit to DR Congo has been postponed to 2026. To ensure continuity of support despite these constraints, the planned trainings for employees in Syria/Iraq on the DCA Code of Conduct and PSEAH were delivered remotely. The Advisor also provided online training to DCA and partner employees in Sudan and Uganda on the Code of Conduct, PSEAH, reporting channels, and the steps required for partners in Sudan to establish their complaints systems.

Throughout 2025, DCA continued to address the CHS recommendations through targeted initiatives with country offices and partners. The Accountability and Complaints Advisor worked closely with country offices to strengthen the monitoring of complaints systems and improve the quality and consistency of information shared with community members. As part of these efforts, visibility materials were re-shared with Country Directors to reinforce their use across programmes. In the fourth quarter of 2025, the Advisor initiated a series of one-on-one meetings with Country Directors and Complaints Focal Points to review how information on the Code of Conduct, PSEAH, and complaints systems is disseminated and monitored at field level. The Advisor also promoted the use of partner checklists and available templates as part of broader capacity-sharing efforts, supporting country offices and partners in meeting CHS commitments and strengthening accountability practices.

9. Responding to the CHS Audit and Other External Reviews and Audits

DCA underwent the Core Humanitarian Standard Re-Certification Audit (CHS Audit) in 2024. Accordingly, a maintenance audit was conducted in 2025 to uphold DCA's certification status. The audit focused on assessing DCA's progress in addressing the three Corrective Action Requests identified during the 2024 Re-Certification Audit. As part of the process, the auditor conducted interviews with employees at Head Office and in selected country offices who were directly involved in responding to the Corrective Action Requests. The audit also included a review of organisational-level documentation as well as materials from four country offices. DCA successfully maintained its CHS certification. The auditor recognised that DCA is taking the necessary steps to address the Corrective Action Requests identified in the previous audit and continues to demonstrate no major non-conformities in its application of the CHS. This outcome reflects DCA's ongoing commitment to strengthening accountability, quality, and continuous improvement across its global operations.

Actions to address the three Corrective Action Requests and other observations resulting from the Re-Certification Audit were developed and followed up throughout 2025. Follow-up will continue into 2026 to ensure these recommendations are fully addressed ahead of the next Re-Certification Audit. During 2025, DCA strengthened its efforts to establish a more structured and monitored approach to information sharing with communities. In March 2025, the Accountability and Complaints Advisor developed an action plan (captured in the DCA Recommendation and Requirement Overview), which requires the Monitoring, Evaluation, Accountability and Learning (MEAL) staff to routinely assess community awareness and satisfaction with the information they receive. Accountability and Complaints Focal Points in country offices are expected to follow up where communication is weak and to support partners in addressing barriers to effective information sharing. Partners are now more systematically guided and trained to use clear, easy-to-understand posters on the Code of Conduct, PSEAH, and Complaints Handling Mechanisms. Focal Points were also required to use the DCA checklist for partners' complaints systems and to re-share key guidelines on information sharing and expected staff behaviour. These expectations have been embedded into Accountability Improvement Plans, ensuring that country offices plan, implement, and report on how communities are informed about DCA, partners' principles, and staff conduct standards. For projects implemented directly by DCA, information on expected staff behaviour and complaints handling mechanisms is now explicitly included in project kick-off workshops.

and monitored through MEAL visits. This more systematic approach strengthens transparency, supports CHS commitments, and ensures that communities are better informed about their rights and the channels available to raise concerns.

10. Sectoral and Cross-Sectoral Networks

DCA is a member of networks and communities of practice that allow the organisation to continually learn from and contribute to collective efforts to improve and innovate our way of working and responding to contextual challenges.

CHS Alliance

DCA is a member of the CHS Alliance, a global network that promotes accountability, quality, and safeguarding in humanitarian action through the CHS. As a CHS-certified organisation, DCA is required to meet the nine commitments outlined in the updated 2024 edition of the CHS. The DCA Accountability and Complaints Advisor is an active member of two CHS Alliance Communities of Practice (CoPs)—on PSEAH and on Accountability to Affected People—which bring together practitioners committed to strengthening accountability and improving support to crisis-affected populations. In 2025, the Advisor also joined a new CoP established by the CHS Alliance for participants of the Investigation Qualification Training Scheme. Through this group, the Advisor took part in a series of webinars and exchanges designed to connect trained investigators, enhance investigative practice, and reinforce sector-wide standards for safe, ethical, and survivor-centred investigations.

Fight Against Facilitation Payment Initiative (FAFPI)

Throughout 2025, DCA continued to participate in Fight Against Facilitation Payment Initiative (FAFPI), a group of diverse private and humanitarian organisations joining forces to fight facilitation payments. The group collects data on facilitation payments and runs initiatives to sensitise staff and stakeholders on this specific form of corruption.

In 2024, FAFPI launched a pilot initiative to collect and analyse data on facilitation payments through a survey conducted in selected countries. DCA chose to participate by carrying out the survey in DR Congo and, as a first step, conducted a context analysis together with the country office. In 2025, the Accountability and Complaints Advisor prepared the survey and shared it with employees for completion. The findings from the survey showed that facilitation payments are widespread in DRC, with nearly half of DCA employees having been asked to pay and law enforcement being the main source of demands. Most employees refuse to pay and report incidents, but concerns remain around safety, confidentiality, and the operational impact of such requests. Employees expressed a strong need for clearer guidance, safer reporting channels, and more training to handle these situations. After collecting the responses, the Accountability and Complaints Advisor will use the results to design and deliver a tailored training for employees in DR Congo in 2026. The training aims to further raise awareness of facilitation payments as a form of corruption and to encourage employees to report such incidents through the appropriate channels.

ACT Alliance

Since 2023, DCA's Accountability and Complaints Advisor has been a member of the ACT

Alliance Safeguarding Community of Practice. The community of practice offers a valuable space for peer learning, collaboration and shared expertise on safeguarding challenges, especially on preventing sexual exploitation, abuse and harassment. Through this platform, DCA accessed practical tools, policy guidance and case studies that inform and improve DCA safeguarding practices. The community of practice offers also opportunities to share courses using the internal learning platform (FABO).

In 2025, DCA, represented by the Head of the SQM Unit, joined the ACT Alliance Quality, Accountability and Complaints Handling Reference Group. This established group supports ACT members in strengthening quality, accountability, safeguarding, and complaints handling practices, and operates in line with ACT Alliance procedures. DCA's participation enhances opportunities for peer learning, coordination, and alignment with sector standards across the ACT Alliance network.

CHS Focal Points Network

In 2023, a group of CHS certified Danish NGOs funded by the Danish Ministry of Foreign Affairs decided to create a network to exchange experiences on the CHS requirements and donors' due diligence. Currently, five organisations are members of the group.

In 2025, the discussions continued with the Ministry of Foreign Affairs (MFA) on using the CHS certification as a passport to reduce the Ministry's due diligence. The network coordinated with the Ministry the set-up of a CHS Alliance–MFA event and a round-table hosted by the CHS Focal Points Network in September 2025, to discuss due diligence and the CHS, inspiring other strategic partnership partners and MFA representatives.

The CHS Focal Points Network was invited to present this initiative during a CHS Alliance Donor Recognition Working Group meeting in November 2025. Following the presentation, and in response to strong interest from other members attending the session, a Nordic CHS Focal Points Network was established in 2025.

11. Planned Focus Areas for 2026

Below activities are planned to be implemented in 2026. Follow-up on each of the focus areas, will be reported in next year's report.

- In 2025, DCA conducted a stock-take exercise to assess synergies between the Complaints System and Whistleblower Scheme, resulting in several recommendations for strengthened systems and close collaboration. Implementation of these recommendations will begin in 2026. As part of this process, the new portal features for both complaints and whistleblower cases will be reviewed and enhanced as needed, and coordination between the two systems will continue to be strengthened.
- DCA is audited each year by external CHS auditors; its last three-year CHS certificate was renewed in 2025 and remains valid until January 2028. In 2026, the DCA Complaints Advisor and the DCA Compliance Coordinator will plan and lead the maintenance audit of DCA's CHS Certification.
- The DCA complaints handling guidelines will be updated and rolled out, with key changes including alignment with CHS Alliance guidelines on managing complaints and the DCA Quarterly Complaints Reporting Template categories that are in use. The

guidelines will also be translated to French.

- The terms of reference for Complaints and Accountability Focal Points will be revised based on inputs provided by the focal points.
- The DCA guidance on the DCA referral mechanism will be revised to address a key observation from the CHS audit. While the current document outlines DCA's responsibility to refer complaints to relevant organisations, it focuses only on sensitive and operational complaints. The revised version will also provide guidance on how to handle unmet community needs that fall outside the complaints category but still require attention.
- The checklist for partners' complaints systems used by country offices to assess and monitor the partners' practices will be revised based on feedback gathered from the Accountability and Complaints Focal Points during one-on-one meetings held in 2025 and from the evaluation of this checklist held during the 4th webinar in December 2025. The updated version will incorporate qualitative elements to better capture the identified gaps and list the recommendations.
- Throughout 2026, DCA will continue to address CHS recommendations through joint initiatives with country offices and partners. This will include reviewing actions taken in response to corrective action requests and observations reflected in country offices' Accountability Improvement Plans. The focus will be on responding to the CHS audit recommendations related to information sharing, particularly around expected staff behaviours and the availability of the complaints systems, to further strengthen transparency and accountability across all programmes.
- Country visits to DR Congo, and Mali will be conducted to address country offices' requests for support. The Accountability and Complaints Advisor will also deliver online trainings on the DCA Code of Conduct, PSEAH, and reporting channels to DCA employees and partners as needed. In addition, the advisor will continue to assess and respond to country offices' needs related to ongoing investigations and complaints handling, ensuring timely and appropriate support.
- A refresher training on sexual exploitation, abuse and harassment and fraud investigations will be organised and offered to the second group of DCA trained investigators (one training was already held in 2025 for the first group).
- A dedicated course on facilitating safe referral will be designed and implemented in two versions: training of trainers and training for employees.
- The Anti-Corruption mandatory training will be revised to reflect the updated Anti-Corruption Policy and to align with new features of the internal learning platform (FABO). To improve accessibility and overcome language barriers in several country offices and among partners, the updated training will also be made available in Arabic and French.
- The completion rate of the mandatory courses on FABO related to Accountability and Complaints will be monitored to ensure all DCA employees complete them.
- As part of a pilot project with FAFPI on facilitation payments, the Accountability and Complaints Advisor will deliver a training to DCA employees in DR Congo in 2026, tailored to the findings from the survey they completed in 2025. The training aims to

raise awareness of this specific form of corruption and encourage both DCA and partner employees to report such incidents through the appropriate channels.

- The Accountability and Complaints Advisor and the Investigations Advisor handling the Whistleblower Scheme will participate in the Humanitarian Networks and Partnerships Weeks in March 2026, which is an opportunity for networking and learning (sessions focusing on Accountability to Affected Populations and SEAH).

These planned activities reflect DCA's ongoing commitment to strengthening accountability, ensuring safe and accessible complaint mechanisms and upholding the rights and dignity of the communities we serve.

ⁱ 1. Corruption indexes: Corruption Perceptions Index, World Governance Indicators (World Bank) and Global Corruption Barometer (Transparency International).

2. Indexes related to sexual exploitation, abuse and harassment (limited data): There is no single global index, but some organisations track related data: UN Conduct and Discipline Reports, Aid Worker Security Database, OECD and Inter-Agency Standing Committee reports on protection from sexual exploitation and abuse.

ⁱⁱ [Corruption Perceptions Index 2025 - Transparency.org](https://www.transparency.org/en/cpi/2025)

12. ANNEX 1: Tables and Figures

Table 1: Overview of complaints by month in 2025

Source: DCA's complaints system 2025

Month	Operational	Sensitive	Total
January	4	1	5
February	1	4	5
March	4	7	11
April	0	3	3
May	1	2	3
June	1	1	2
July	0	1	1
August	3	2	5
September	2	6	8
October	0	3	3
November	3	4	7
December	1	2	3
Grand total	20	36	56

Table 2: Overview of the category of complainants

Source: DCA's complaints system 2025

Category of complainants	Operational	Sensitive	Total
Anonymous	1	1	2
Community member (not supported by DCA)	7	5	12
Current DCA employee (operations)	0	2	2
Current DCA employee (programme)	0	3	3
People supported by DCA	3	3	6
DCA implementing partner	1	8	9
DCA volunteer	2	1	3
External to DCA (candidate excluded from a recruitment process)	2	3	5
External to DCA (donor)	0	1	1
External to DCA (supplier)	1	2	3
Former DCA employee	3	0	3

Other external stakeholder	0	7	7
Others	0	2	2
Grand total	20	36	56

Table 3: Overview of complaints received in the Head Office by country 2025

Source: DCA's Complaints System 2025

Country	Operational	Sensitive	Total
Afghanistan	0	1	1
Bangladesh	0	1	1
Cambodia	0	1	1
CAR	0	1	1
Denmark	6	2	8
DR Congo	2	7	9
Ethiopia	0	1	1
Kenya	0	4	4
Lebanon	0	1	1
Mali	0	1	1
Morocco	3	0	3
Nepal	0	0	0
Palestine	0	0	0
South Sudan	2	2	4
Sudan	0	1	1
Syria	3	4	7
Uganda	0	2	2
Ukraine	4	4	8
Unspecified	0	2	2
Zimbabwe	0	1	1
Grand total	20	36	56

Figure 2: Sensitive complaints received over the years

Source: DCA's complaints system 2025

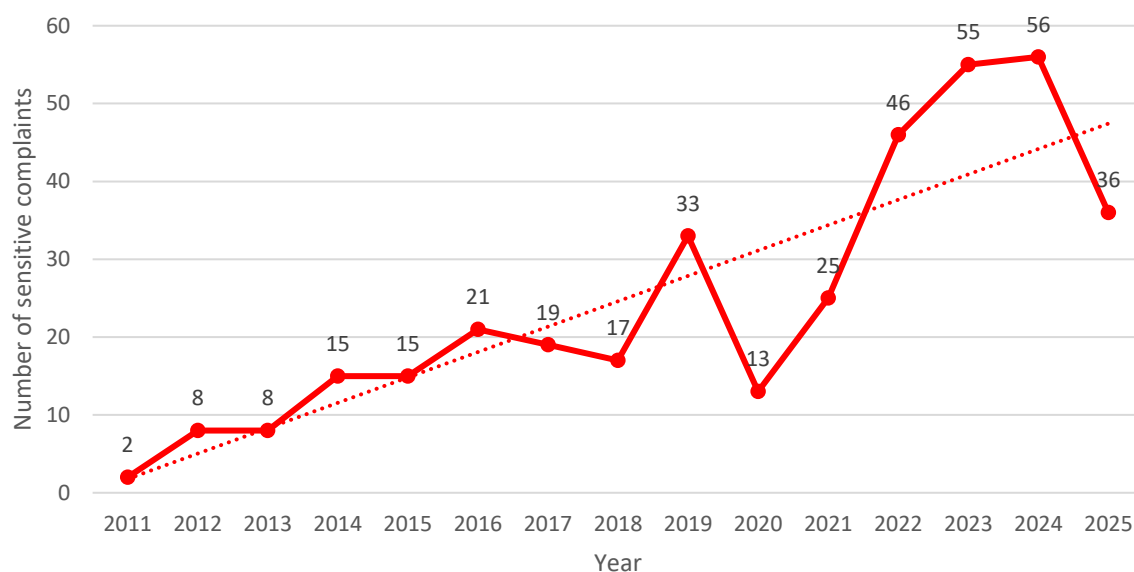


Table 5: Overview of categories and numbers of Subjects of Concern (SoC) among sensitive complaints

Source: DCA's complaints system 2025

Categories of SoCs	Number of SoCs
Current DCA employee (management)	3
Current DCA employee (operations)	10
Current DCA employee (programme)	13
DCA implementing partner	11
Former DCA employee	1
Third party which collaborated with DCA's implementing partner	2
Others	1
Grand total	41

Figure 3: Overview of complainants by gender among sensitive complaints

Source: DCA's complaints system 2025

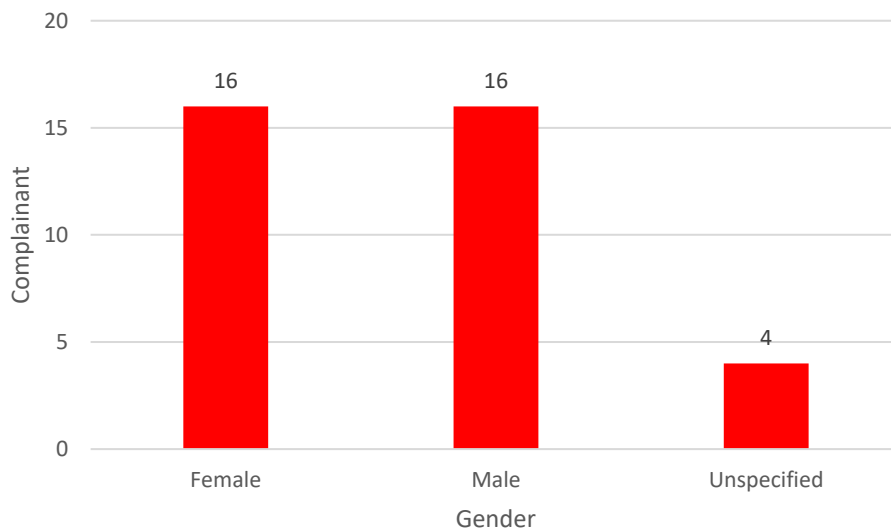


Figure 4: Subjects of concern of sensitive complaints, by gender

Source: DCA's complaints system 2025

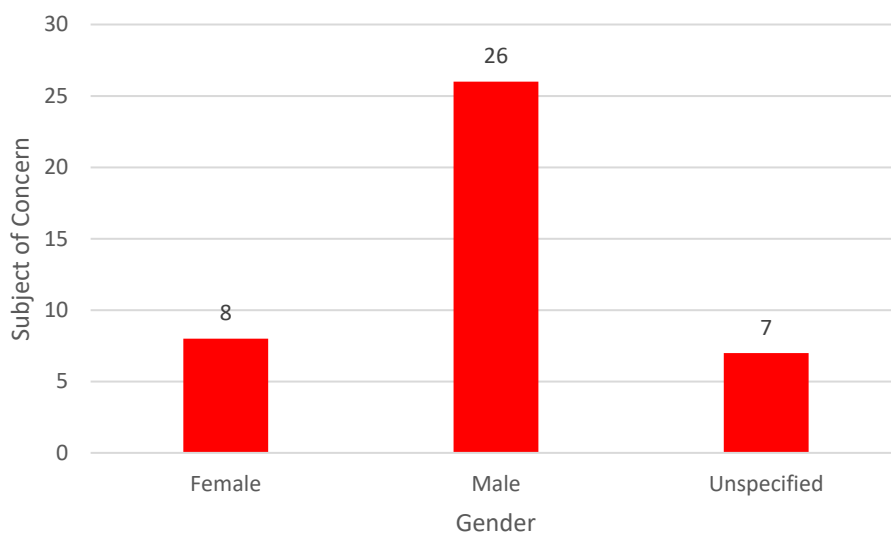


Table 6: Status of the sensitive complaints received in 2025

Source: DCA's complaints system 2025

Status	Number of complaints
Closed	29
Open	7
Grand total	36

Table 9: Overview of types of losses and risks resulting from misconduct

Source: DCA's complaints system 2025

Types of losses and risks resulting from misconduct	Number of closed sensitive complaints
Financial	4
Reputational	1
None	12
Grand total	17

Table 10: Overview of corruption-related complaints by type of corruption

Source: DCA complaints system 2025

Type of corruption	Number of complaints
Abuse of power / Nepotism	2
Bribery	2
Bribery / favouritism	4
Conflict of interest / Nepotism	2
Fraud and embezzlement	3
Fraud and embezzlement / Abuse of power	4
Fraud and embezzlement / Conflict of interest	2
Fraud and embezzlement / Nepotism	3
Money Laundering	1
Nepotism and favouritism	1
Theft	3
Grand total	27

Table 11: Overview of corruption-related complaints by country

Source: DCA complaints system 2025

Country	Number of complaints
Afghanistan	1
Cambodia	0
CAR	1
Denmark	1
DR Congo	7

Ethiopia	0
Iraq	0
Kenya	4
Lebanon	0
Libya	0
Mali	1
Nepal	0
Palestine	0
South Sudan	1
Sudan	1
Syria	4
Uganda	1
Ukraine	2
Unspecified	2
Zambia	1

Grand total	27
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Figure 6: Sexual exploitation, abuse and harassment complaints per country

Source: DCA's complaints system 2025

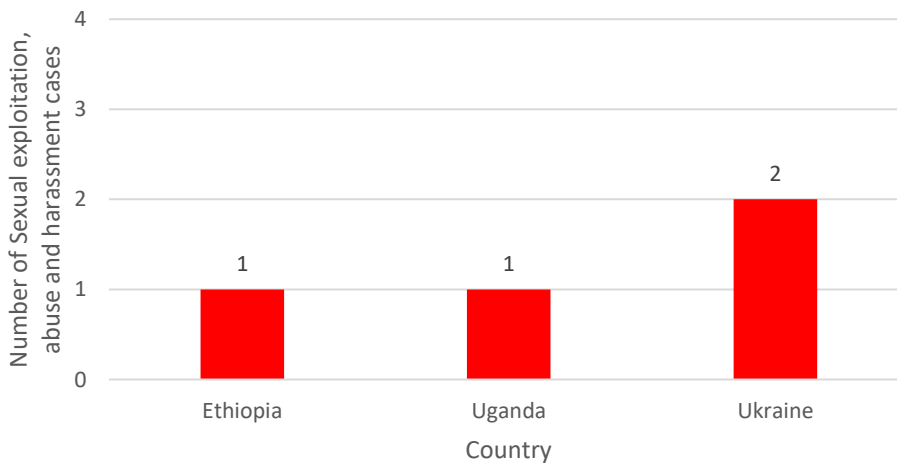


Figure 7: Operational complaints in Denmark reported to the DCA Head Office in 2025

Source: DCA's complaints system 2025

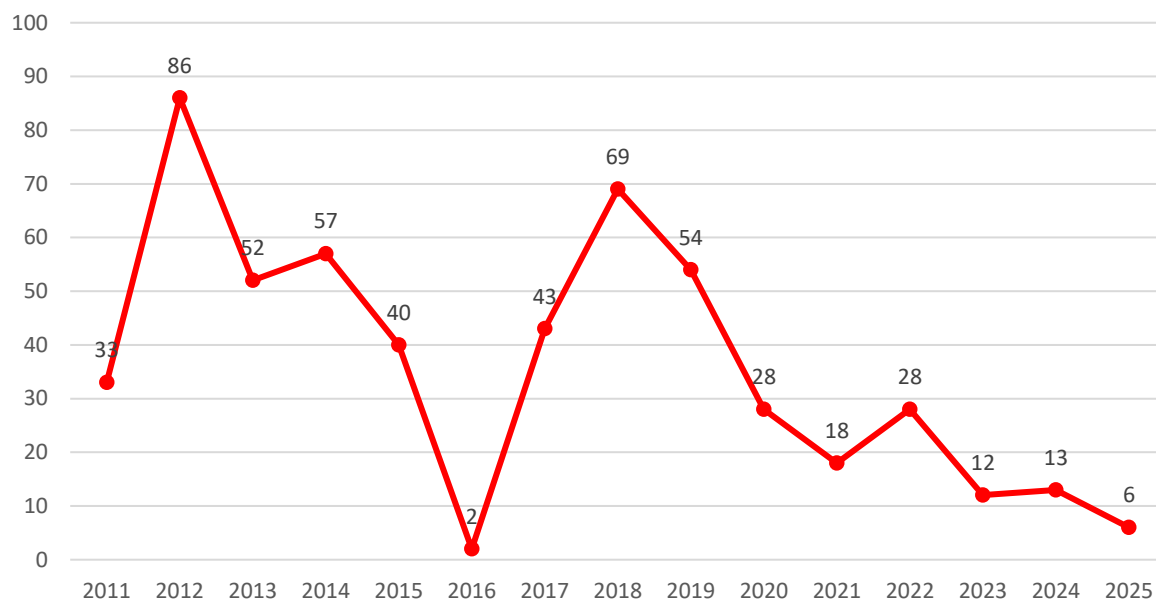


Figure 8: Overview of categories of operational complaints received in Denmark.

Source: DCA complaints system 2025

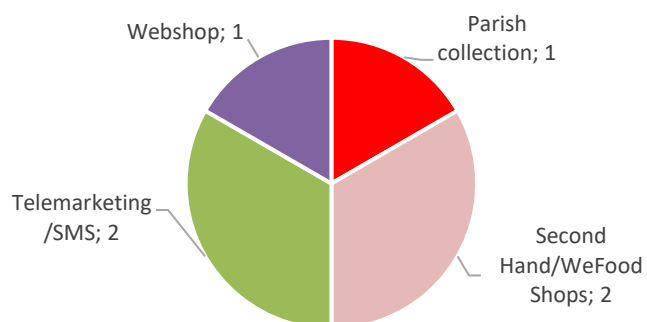


Figure 9: Overview of operational complaints received by country offices per year

Source: Annual Report data set

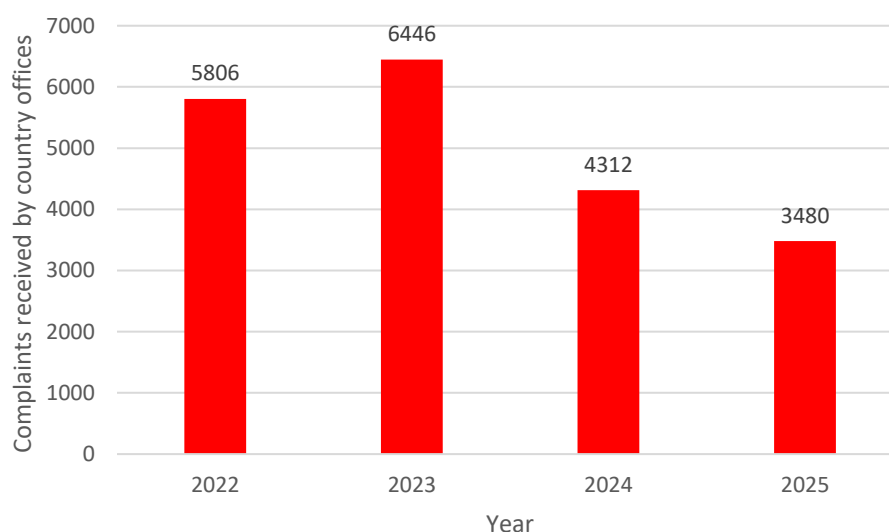


Table 14: Categories of complaints received in the country offices

Source: Quarterly Complaints Reporting Template 2025

Categories of complaints received in country offices	Number of complaints	Percentage of all complaints
Request for information (category 1)	1,050	30.1%
Request for support/assistance (category 2)	1,549	44.3%
Minor operational complaint (i.e. minor complaint about DCA's projects and activities) (category 3)	803	23.0%
Major operational complaint (i.e. major complaint about a sensitive protection issue such as beneficiaries' safety and security, and gender-based violence) (category 4)	76	2.2%
Complaint about violation of DCA's CoC and policies (i.e. incidents of sexual exploitation and abuse, fraud and corruption, etc.) (category 5)	15	0.4%
Grand total	3,495	100.0%

Table 15: Overview of the channels through which complaints were received at the country offices

Source: Quarterly Complaints Reporting Template 2025

The channels through which complaints were received in country offices	Number of complaints	Percentage of all complaints
Direct communication with DCA employees (e.g. Monitoring & Evaluation field visit, surveys/assessments, etc.)	1,198	34.3%
DCA hotline (call, SMS, WhatsApp)	1.067	30.5%
DCA complaints boxes	385	11.0%
Office walk-ins (complaints office or DCA office)	342	9.8%
Referred by a DCA employee	179	5.1%
Referred by another NGO	271	7.8%
Country offices' complaints email address	53	1.5%
Social media channels (Facebook, X, etc.)	0	0%
Grand total	3,495	100.0%

Figure 10: Overview of the complaints received by partners per year

Source: Annual Report data set

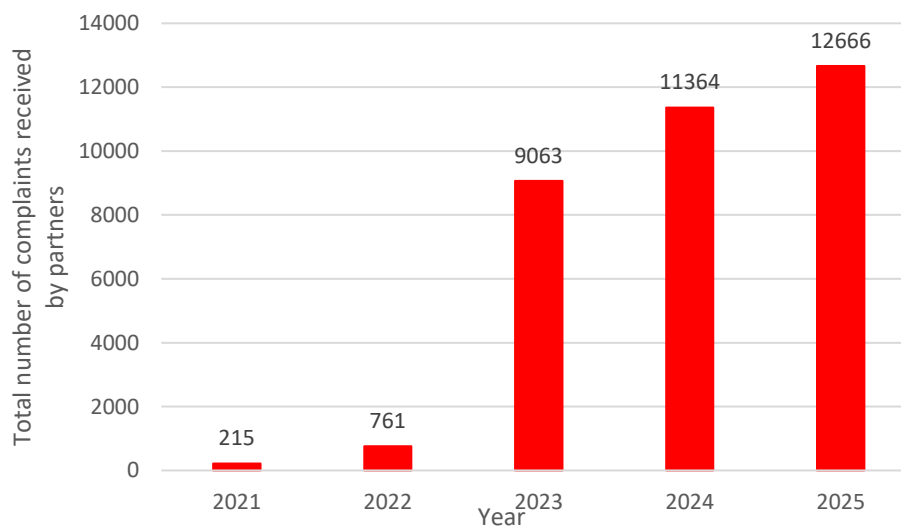


Table 16: Overview of categories of complaints received by partners in 2025

Source: Quarterly Complaints Reporting Template 2025

Categories of complaints received in country offices	Number of complaints	Percentage of all complaints
Request for information (category 1)	4,667	36.8%

Request for support/assistance (category 2)	4,783	37.7%
Minor operational complaint (i.e. minor complaint about partner's projects and activities) (category 3)	1,695	13.4%
Major operational complaint (i.e. major complaint about a sensitive protection issue such as beneficiaries' safety and security, and gender-based violence) (category 4)	1,507	11.9%
Complaint about violation of DCA's/Partner's CoC and policies (i.e. incidents of sexual exploitation and abuse, fraud and corruption, etc.) (category 5)	4	0.001%
Grand total	12,656	100.0%

Table 17: Overview of the channels through which complaints were received by partners in 2025

Source: Quarterly Complaints Reporting Template 2025

The channels through which complaints were received among partners	Number of complaints	Percentage of all complaints
Partner's hotline (call, SMS, WhatsApp)	4145	54.9%
Direct communication with partner employees (i.e. Monitoring & Evaluation field visit, while filling a survey/assessment, etc.)	1647	21.8%
Office walk-ins (complaints office or partner office)	911	12.1%
Partner's complaints boxes	424	5.6%
Partner's social media channels (Facebook, X, etc.)	220	2.9%
Referred by another NGO	96	1.3%
Partner's complaints email address	80	1.1%
Referred by a partner employee	30	0.4%
Others	3	0.001%
Grand total	7,556	100%