

DTDA's Complaint/Whistleblowing Mechanism Policy

1 Policy scope

The aim of this policy is to ensure that all beneficiaries, participants, partners and other stakeholders engaged in projects, campaigns or other activities implemented or supported by the Danish Trade Union Development Agency (DTDA) are able to raise complaints to the senior management. Equally, the policy serves to ensure that all DTDA employees and representatives are able to do a whistleblowing, if and when this is required. The policy will contribute to transparency and responsibility within the organisation and accountability towards beneficiaries, participants, partners and other stakeholders. Questions regarding this policy or on how to make a complaint/whistleblowing should be sent to: complaint@dtda.dk.

2 How to make a complaint/whistleblowing

2.1 What is a complaint/whistleblowing

DTDA uses broad definitions of the terms 'complaint' and 'whistleblowing' to ensure that all relevant situations are covered. A *complaint* is simply a statement of disapproval or concern – raised by someone outside the organisation – in relation to a project, campaign or activity implemented or supported by the DTDA, or in relation to the conduct or the actions of a DTDA employee or representative. *Whistleblowing* refers to the same things but is merely used to express that the person submitting the disapproval or concern comes from within the organisation.

A complaint/whistleblowing may deal with a breach of DTDA's Code of Conduct or one of DTDA's policies (e.g. the Anti-Corruption Policy, the Conflict of Interest Policy, the Anti-Terrorism Policy, the Child Safeguarding Policy or the Prevention of Sexual Exploitation, Abuse and Harassment Policy), but it may also deal with any other observed or suspected instance of malpractice or misconduct on the part of DTDA or one of its employees or representatives.

2.2 Who can make a complaint/whistleblowing

Any person, organisation or company can make a complaint/whistleblowing to the DTDA.

2.3 How to make a complaint/whistleblowing

A complaint/whistleblowing can be made to DTDA by sending an email to: complaint@dtda.dk, or by posting a letter to the following address:

Ulandssekretariatet, Islands Brygge 32D
2300 Copenhagen S, Denmark
Att.: Compliance and Management Coordinator

In either case, use of the attached complaint/whistleblowing form (see Annex 1) is recommended.



3 How complaint/whistleblowing cases are handled

3.1 Receiving, categorising and forwarding complaint/whistleblowing cases

To ensure confidentiality and procedural consistency, any complaint/whistleblowing made to DTDA is received by one person only, namely DTDA's Compliance and Management Coordinator. If the matter involves the Compliance and Management Coordinator, the complaint/whistleblowing should therefore be made directly to DTDA's Director. In the same way, the Compliance and Management Coordinator is instructed to report directly to DTDA's Chairman of the Board if the received complaint/whistleblowing implicates the DTDA Director.

The Compliance and Management Coordinator will categorise the received complaint/whistleblowing and forward it to DTDA's Complaint/Whistleblowing Committee.

3.2 Complaint/Whistleblowing Committee

The composition of the Complaint/Whistleblowing Committee shall be adjusted in accordance with the categorisation of the received complaint/whistleblowing. Unless the received case involves any of the persons holding these functions, the Committee will consist of the Chairmanship of DTDA's Board, the DTDA Director and the Compliance and Management Coordinator (who acts as secretary for the Committee). In addition, the Committee will consist of:

- The Chief Accountant and the Head of Programmes, if the complaint/whistleblowing concerns a breach of DTDA's Anti-Corruption Policy, Conflict of Interest Policy, or Anti-Terrorism Policy.
- The PSEAH focal point, if the case concerns a breach of DTDA's Prevention of Sexual Exploitation, Abuse and Harassment Policy or the Child Safeguarding Policy.

If the Chairmanship of DTDA's Board assess that any of the above DTDA employees are unable to act with impartiality and objectivity in a given case, the relevant employee(s) shall be disqualified from participating in the handling of the case in question.

If the received complaint/whistleblowing concerns or implicates the Chairmanship of DTDA's Board, the entire DTDA Board will substitute the Committee and handle the case.

3.3 Confirmation and estimated timeframe

Unless a given case is submitted anonymously to DTDA, the person making the complaint/whistleblowing will receive a confirmation of receipt shortly after having submitted the case. And as soon as the Complaint/Whistleblowing Committee has been convened, DTDA will follow up with an estimated timeframe for the handling of the case.

DTDA shall do its best to handle all complaint/whistleblowing cases in a fast and efficient manner, but the duration will vary according to the scope and complexity of the individual case. DTDA shall ensure that anyone who has submitted a complaint/whistleblowing to the organisation is regularly updated on the estimated timeframe for the handling of the case.

3.4 Ensuring confidentiality

DTDA shall adhere to relevant legislation regarding management of personal data and will treat all complaint/whistleblowing cases with a high degree of confidentiality. Information about the



person submitting the complaint/whistleblowing and any individuals mentioned therein shall only be available to the restricted group of people involved in the handling of a case.

The Complaint/Whistleblowing Committee may be required to approach one or more DTDA employees as part of the investigation of a given case, but this will be done on a strict need-to-know basis and with a strong emphasis on the need for confidentiality. Non-compliance with the requirement for confidentiality regarding information pertaining to a complaint/whistleblowing case will be met with disciplinary action by DTDA.

Especially in complaint/whistleblowing cases concerning breaches of DTDA's Prevention of Sexual Exploitation, Abuse and Harassment Policy or Child Safeguarding Policy, DTDA employees outside the Complaint/Whistleblowing Committee will only be involved in an investigation if this is considered absolutely necessary.

If DTDA should receive an anonymous complaint/whistleblowing case, this will be treated with the same degree of seriousness as a case submitted by an identifiable sender. However, the person reporting the case in question should be aware that anonymous submissions are much harder to investigate and less likely to lead to actionable conclusions.

3.5 No reprisals for submitting a complaint/whistleblowing case

No person or entity making a complaint/whistleblowing in good faith will be subjected to any kind of reprisals for submitting truthful information pertaining to any of DTDA's policies, including in cases where a subsequent investigation turns out to be inconclusive.

3.6 Investigation and subsequent follow-up

The Complaint/Whistleblowing Committee will convene as soon as possible following the receipt of a complaint/whistleblowing case in order to review the matter, determine whether any immediate action is required (e.g. to protect a person or safeguard resources), and decide on the steps to be taken with an eye to ensuring a prompt, thorough and appropriate investigation.

Depending on the subject matter of the received complaint/whistleblowing case, the Committee will handle the investigation and any potential follow-up (e.g. disciplinary action) in accordance with the provisions given in DTDA's Anti-Corruption Policy, Conflict of Interest Policy, Anti-Terrorism Policy, Child Safeguarding Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, as applicable.

When the Committee has reached a final resolution regarding a given complaint/whistleblowing case, this will be duly communicated in writing to the person or entity who has submitted it. The response shall, to the extent possible, present the main conclusions of the investigation and the follow-up actions planned or implemented by DTDA, if relevant.

DTDA shall treat all received complaints very seriously, but should the Committee find that a given complaint concerns an issue that is entirely outside the jurisdiction or scope of what DTDA can reasonably be held accountable for, the complainant will receive a dismissal of the complaint and potential information about where to appropriately submit this.



Annex 1: Complaint/Whistleblowing form

Complaint/whistleblowing form		
Contact information <i>If you wish to submit the complaint anonymously, please leave the below section black.</i>		
Making the complaint as:		
Organisation ☐ Name of organisation: Contact person: E-mail: Phone:	Private person ☐ Name: E-mail: Phone:	
Complaint/ whistleblowing		
Describe the complaint/whistleblowing as adequately and detailed as possible:		
Is there any documentation attached:	Yes ☐	No ☐
By sworn statement I declare that the information given in the complaint/whistleblowing is correct:	Yes ☐	
Date for submitting the complaint/whistleblowing:		