

**Safeguarding
&
Code of Conduct**
Annual Report 2023

Introduction

The Safeguarding & Code of Conduct Annual Report (the “Annual Report”) has been produced by the Safeguarding & Code of Conduct Unit (HQ) in collaboration with the Regional Safeguarding & Code of Conduct Coordinators. The drafting process is inclusive of key stakeholders in DRC and ensures DRC’s top management ownership: the Annual Report is reviewed and commented by the Gate B (HQ) Intake Committee and by the Global Accountability to Affected Populations Advisor, approved by the Executive Director People & Organisation and endorsed by DRC’s Executive Management Team.

The Safeguarding & Code of Conduct Annual Report aims at promoting transparency internally and externally by sharing data in relation to DRC’s complaint mechanism (the “Code of Conduct Reporting Mechanism” or “CoCRM”) and at upholding accountability for addressing misconduct promptly and appropriately through an update regarding on DRC's actions, processes, and investigation outcomes.

The Annual Report further allows DRC’s Workforce and management but also DRC’s donors to identify areas of concern, implement necessary improvements, and develop strategies for preventing future acts of misconduct, based on the analysis of current data, trends, and patterns.

Finally, it updates the public on project developments, progress and good practices in the Safeguarding and Code of Conduct area, which enable improvement of future measures and actions, creates a safe and respectful work environment, reinforces the DRC's values, and fosters a culture of integrity and accountability.

Executive Summary

Revision of the Code of Conduct and Restructuring of the Code of Conduct Reporting Mechanism

DRC has had a Code of Conduct since 2007, and a Code of Conduct Reporting Mechanism (CoCRM) since 2012. They are the cornerstones of DRC's commitment to accountability and integrity.

The Code of Conduct was revised in December 2022 and rolled-out in 2023 in the contracts of all members of DRC's Workforce globally. It maintains explicit adherence to the 'IASC 6 Core Principles' (PSEA) and the Core Humanitarian Standard (CHS). In November 2023, the Code of Conduct was slightly updated and the acronym LGBTQIA+ replaced by SOGIESC (Sexual Orientation, Gender Identity and Expression, and Sex Characteristics) to ensure alignment with DRC's Age, Gender and Diversity Mainstreaming ("AGDM") policy. The occasion was taken to underline DRC's Human Rights approach regarding discrimination.

The CoCRM functions as a Whistleblower mechanism in which a breach or a concern relating to the Code of Conduct may be reported confidentially. The CoCRM is accessible to all, including people who choose to remain anonymous. In 2023, following the restructuring of the Code of Conduct Reporting Mechanism (CoCRM), a minimum of one Registrar and one Safeguarding & Code of Conduct focal point were appointed in each of DRC's operations. They ensure that reports of suspected misconduct (RSMs) can always be made in person and support is provided to survivors of Sexual Exploitation, Abuse and Harassment (SEAH). Currently there are 46 Registrars and 75 Safeguarding & Code of Conduct Focal Points globally.

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

DRC continued to focus on the prevention from SEAH and published the Global PSEAH Policy in 2023. This policy establishes DRC's institutional commitment and responsibility to preventing and responding to SEAH as well as a clear set of rules for DRC's workforce and partners, while maintaining DRC's CoCRM Survivor Centred Approach at its core. As a follow-up, the Safeguarding & Code of Conduct Unit (HQ) also published its vision and priorities with particular attention towards DRC's top management.

As mentioned, a network of Safeguarding & Code of Conduct focal points was also established at all levels in DRC to ensure the roll-out of the Global PSEAH Policy and ensure segregation between investigation and support to survivors of sexual misconduct.

Since 2023, the Safeguarding & Code of Conduct Unit, supported by regional coordinators, systematically facilitates a session regarding the prevention of sexual violence and the understanding of its precursors as part of DRC's HEAT trainings.

Professionalisation of Investigations

In parallel to the above developments and case handling process, the Safeguarding & Code of Conduct Unit has also continued the roll-out of DRC’s internal investigation training scheme which notably embeds DRC’s survivor centred approach (the “Survivor Centred Approach”). One hundred and twenty-two (122) members of DRC’s Workforce have received this training to date.

Number of Reports of Suspected Misconduct (RSMs)

Since 2018, the number of reports (RSMs) received had been continuously and steadily increasing. In 2023, for the first time, the number of RSMs slightly decreased following substantial efforts made to ensure that minor workplace issues are first presented to management and/or HR.

This decrease happened while important developments, awareness and engagement of the different stakeholders have been maintained to heighten reliance and visibility in DRC’s reporting mechanism.

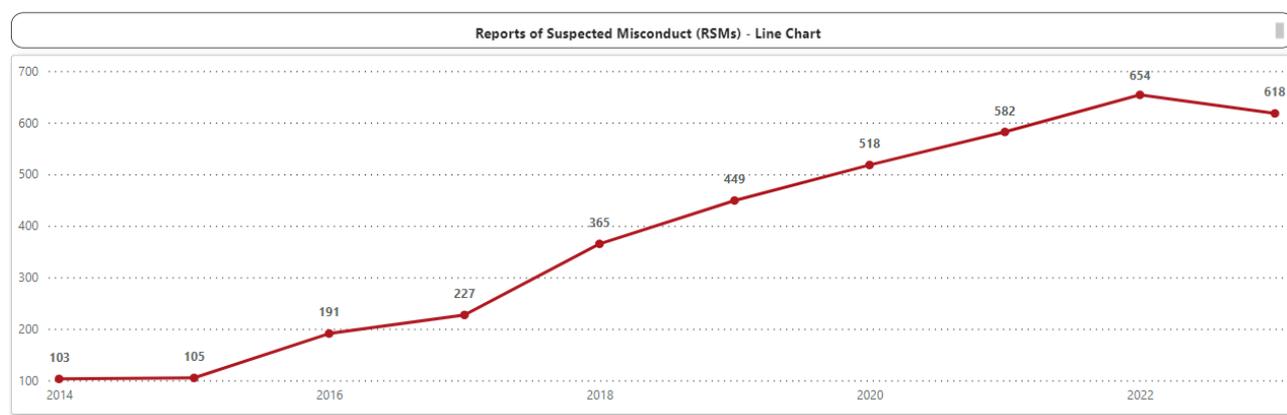


Chart 1

Until the restructuring of the CoCRM, Gate A (Country) was the “gate” that was the most utilized to report misconducts. As anticipated, Gate B (HQ), (which retains jurisdiction over alleged cases of SEAH and high scale fraud & corruption) and Gate A+ (Region) are now the most utilized. This could be because distance from the place of misconduct is perceived as offering additional guarantees in terms of confidentiality and prevention of conflict of interest:

Gate (Level)	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
A (Country)	100	82	135	143	254	285	318	365	391	131
A+ (Regional Office)				6	8	15	24	29	36	258
B (HQ)	3	23	56	78	103	149	176	188	227	229
Total	103	105	191	227	365	449	518	582	654	618

Table 1

The type of misconduct that was most complained about in 2023 has remained “fraud & corruption” (25% of all allegations received). It is understood that DRC’s definition of “Fraud & Corruption” is broad and for example encompasses conflicts of interest or nepotism. DRC’s zero tolerance approach towards “fraud & corruption” also requires it to be broadly interpreted.

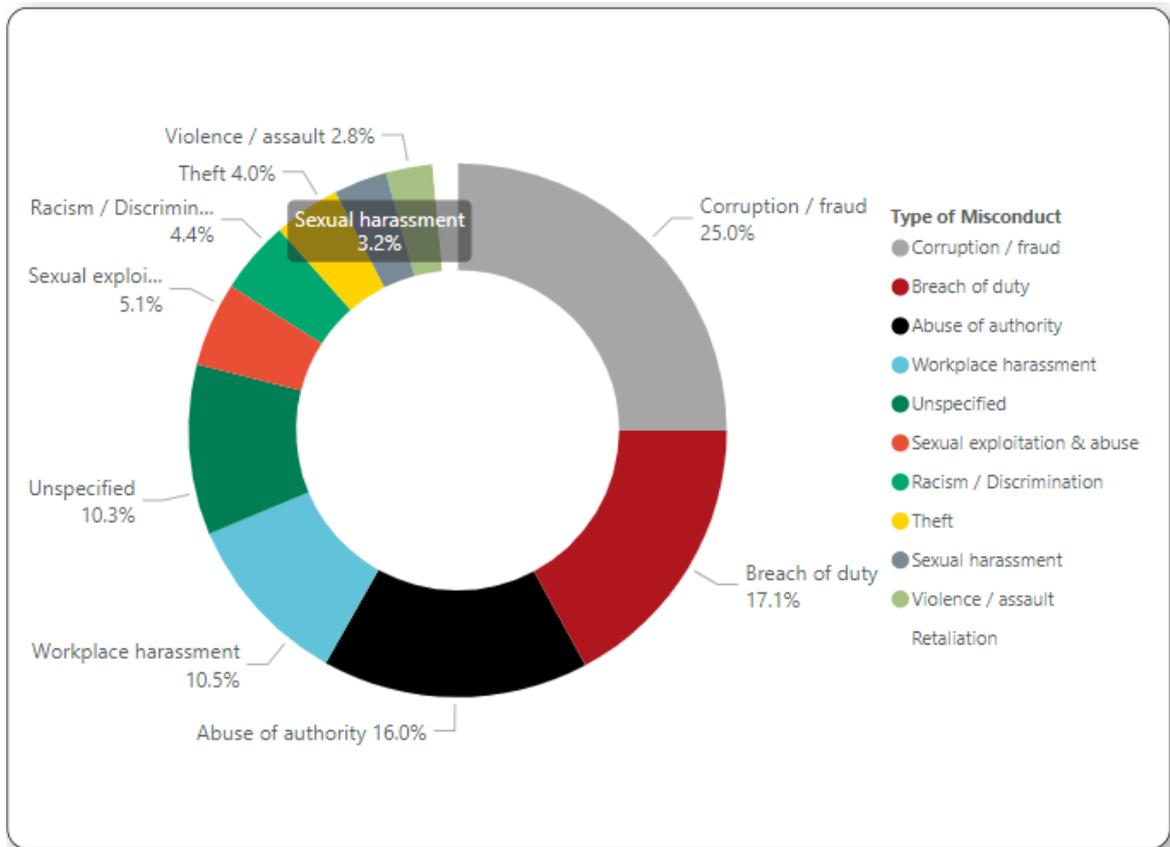


Chart 2

Investigations only take place in the most severe situations (e.g. fraud & corruption, SEAH, discriminations etc.). In less severe circumstances, the RSMs may be notably referred, e.g. in cases where an HR response is most appropriate, the RSM will be referred to the relevant HR.

The number of RSM referred to management by the committee in charge of the response (the “Intake Committee”) remains high (37% in 2022 and 2023) and constitutes the main response given by the CoCRM to Reports of Suspected Misconduct.

The importance of this response may suggest that whistleblowers (the “Reporting Persons”), and notably staff members, do not feel sufficiently safe to speak to their colleagues and managers to solve minor issues or disputes at the workplace. In some instances, the claims can also be objectively minor, purely contractual or not related to the Code of Conduct which outlines the need for continuing internal and external communication around the purpose of the CoCRM. The revision and roll-out of the Code of Conduct in 2022 and 2023 was an important development made in that regard.

The second response given by Intake Committees is “investigation” (19%). In 2023, DRC launched 136 investigations compared to 137 in 2021 and 139 in 2022. The number of investigations is thus steady despite the slight decrease of RSMs in 2023, which notably evidences that the restructuring of the CoCRM has not harmed the trust it has gained over the years.

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I. Roll-out of the new Code of Conduct

In 2023, DRC undertook the roll-out of the revised Code of Conduct. The objectives of this revision were to highlight DRC's commitment to the Core Humanitarian Standard (the "CHS") and the IASC Six Core Principles on SEA notably, to adopt a single standard of behaviour for all DRC's workforce (the "Workforce") and provide clarification to the members of the Workforce, DRC's management and Code of Conduct investigators in the course of their duties.

This new Code of Conduct is available on DRC's website ([Code of Conduct | DRC Danish Refugee Council](#)). It has been rolled-out over 2023 and it now applies to DRC and to its Workforce without distinction. All Staff Members including but not limited to international or national Staff, Managers or not, frontline, support or programme Staff, paid or unpaid trainees, students and Irregular Workers are equally obliged by DRC's Code of Conduct. It is an integral part of their terms and conditions of engagement with DRC. This Code of Conduct therefore has a contractual nature. Mandatory trainings have been updated and are available in English, French, Spanish, and Arabic languages.

DRC's implementing partners are also required to abide by the Code of Conduct, or to have and employ their own that either meets or exceeds DRC's. DRC's suppliers are required to abide by DRC's Suppliers Code of Conduct and DRC's General Conditions of contract. A training portal for partners was opened, to allow them to access DRC's training materials and online courses.

DRC's Workforce is now provided with key information such as the list of breaches which are considered severe in nature and hence likely to trigger an investigation (Sections 4 to 9 of the Rules of Conduct), clear definitions of concepts such as "Fraud & Corruption", "Sexual Harassment", "Discrimination" etc., and an outlook of the main reporting lines. Additionally, DRC's Workforce is provided with a guidance note which helps in interpreting certain points and linking the provisions of the Code of Conduct regarding PSEAH to the IASC Six Core Principles.

Finally, supported by the statement of the Secretary General, the new Code of Conduct emphasizes the requirement to fast-track RSMs containing SEAH allegations by reporting them immediately and directly to the Gate B (HQ) of DRC's CoCRM.

Anti-Discrimination (LGBTQIA+ vs. SOGIESC)



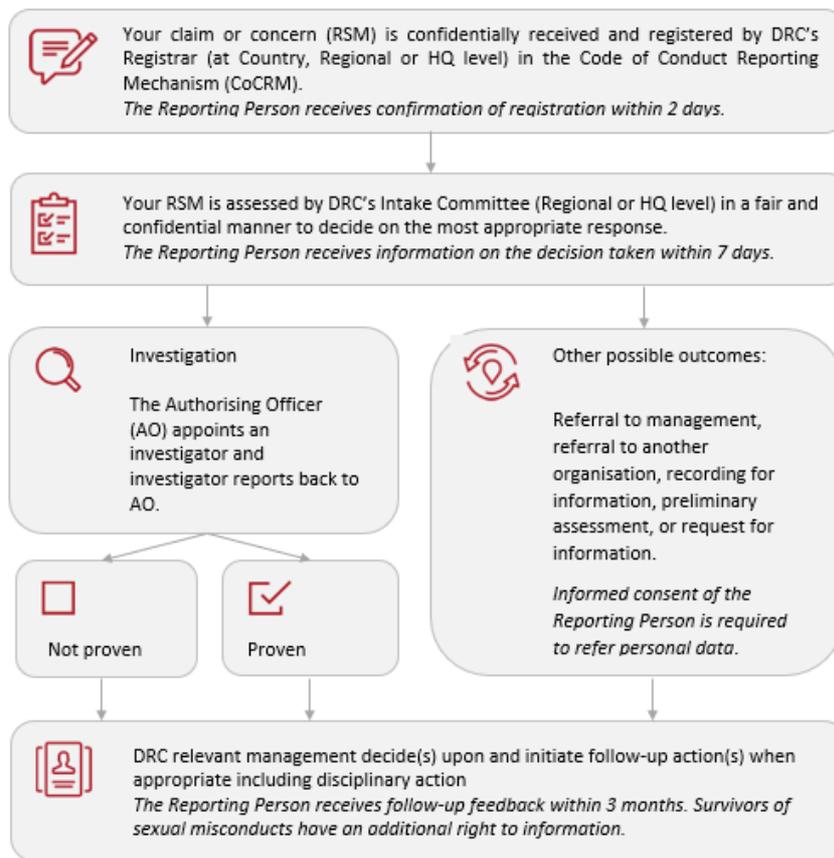
As a humanitarian organization, DRC has belief in the equal rights of all human beings and takes a rights-based approach to its work. This also applies to DRC's Code of Conduct. The terminology in use in the Code of Conduct has progressed from LGBTQIA+ to "sexual orientation, gender identity and expression, and sexual characteristics" (SOGIESC) in order to align with how other discrimination lines are conceptualized in the Code of Conduct itself but also in the AGDM glossary (SOGIESC includes lesbian, gay, bisexual, transgender, intersex and queer (LGBTIQ) persons as well as a range of people whose identities or practices are not included within those terms (+).

The commitment to our core values, inclusivity and non-discrimination remains clear, DRC will not accept discrimination of any kind. Discrimination against LGBTQIA+ individuals, groups or communities based on their SOGIESC thus expressly remain among what DRC considers very severe breaches of our Code of Conduct.

II. Roll-out of the restructured Code of Conduct Reporting Mechanism (CoCRM)

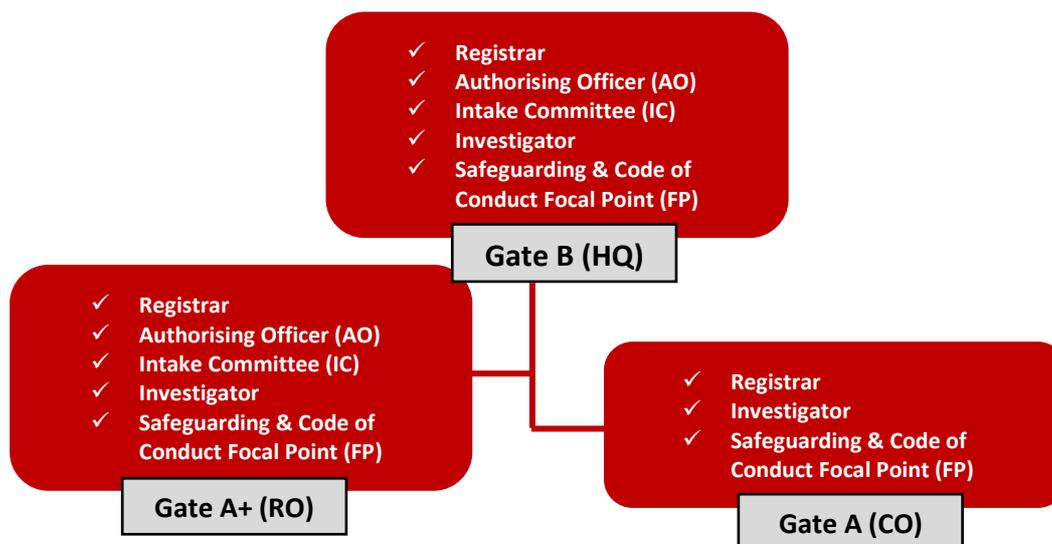
In 2023, DRC also rolled-out the new structure of the Code of Conduct Reporting Mechanism to ensure that it is in place and that it is functioning in all DRC’s operations. The new structure is aimed at increasing accessibility by fostering confidentiality and independence, but also at professionalising investigations and safeguarding measures in our activities.

The CoCRM continues to be built around five (5) functions (the “Safeguarding & Code of Conduct Functions” or “Functions”) and the processing of RSMs is unchanged:



Graphic 1

However, the five (5) Safeguarding & Code of Conduct Functions are no longer equally distributed among the different levels of the organisation. The Gate A+ (Region) and Gate (B) levels will continue to hold the five (5) Functions, while the Functions of Intake Committee and Authorising Officer are removed at Gate A (Country) level to distance the decision making and monitoring of investigations from the management in charge of following up. Gate A (Country) however remains an essential entry point of the CoCRM with the presence of a Registrar in the country.



Graphic 2

The Functions of Authorising Officer are *ex-officio* held by the Code of Conduct Global Advisor (HQ) and the four (4) Regional Safeguarding & Code of Conduct Coordinators (the « ReSCOs »). This structure ensures that the authorisation, monitoring and reporting on investigations is always conducted by a full-time professional.

Forty-six (46) Registrars have been nominated at all levels, including at Gate A (Country) level to ensure that all DRC legal entities allow the report of misconduct in person. This Function is also essential to ensure that sensitive feedback (e.g. SEAH) is received from the local Community Feedback Mechanism (the « CFM ») and appropriately handled. Additionally, DRC has nominated seventy-five (75) Safeguarding & Code of Conduct Focal Points in charge of raising awareness, conducting PSEAH activities and liaising with Survivors of SEAH allegations when appropriate. Investigators are being trained periodically and are available at all levels of the organisation in order to ensure contextualisation and flexibility when selecting the relevant investigation team, specifically when it comes to the risks and needs identified.

The five (5) Intake Committees at Gate A+ (Region) and Gate B (HQ) levels have all been recomposed. The members of the Intake Committees are appointed by the relevant Executive Director, but directors at all levels are no longer eligible for membership. Senior Management Team members may be appointed as members within a maximum of a third. Core expertise is now represented (e.g. finance, supply chain, protection, safety etc.).

Main Benefit Expected vs. Results

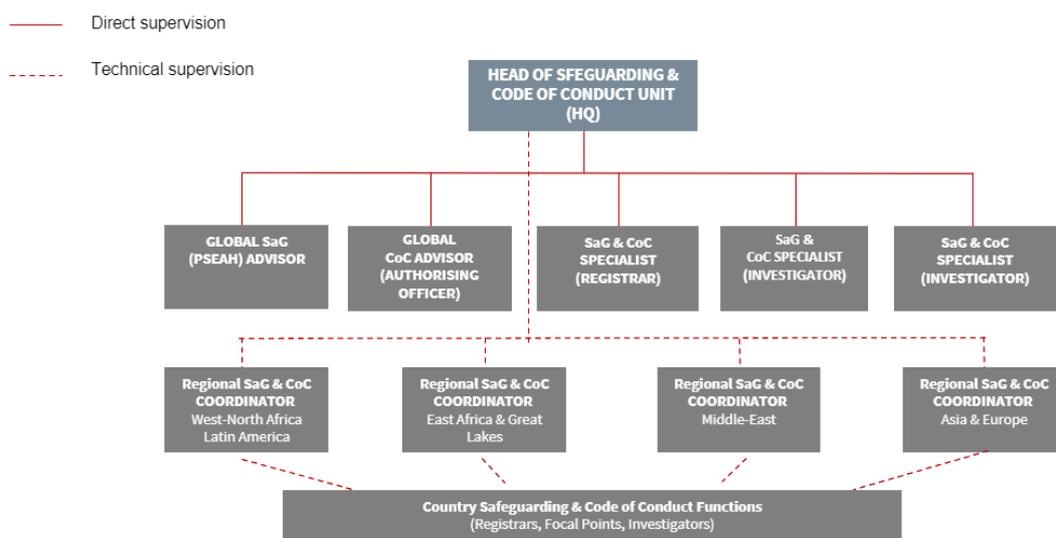
Nr.	Benefit	Description	KPI	Result 2023
1.	Accessibility of the CoCRM	The CoCRM is always accessible in all DRC’s operations and duly connected with the relevant Community Feedback Mechanism at Country level.	100% of DRC’s operations have appointed a Registrar.	Completed (all operations have a Registrar)
2.	Conduct of investigations	The global time necessary to investigate an RSM (from the date of receipt to the date of closure) is reduced.	The time to conduct investigation is reduced by 10% per year.	Completed (9,68% decrease from 2022 to 2023)

III. Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

The inclusion of the prevention and response to SEAH incidents in the frame of DRC’s institutional and operational structure in 2022 has allowed important developments, including the launch of DRC’s Global PSEAH Policy in 2023.

The structure established in 2022 consists of a Global Safeguarding (PSEAH) Advisor leading the global « PSEAH » aspect of the Safeguarding & Code of Conduct structure which includes the Regional Safeguarding & Code of Conduct Coordinators at regional level (full time positions) and the Safeguarding & Code of Conduct Focal Points at Country level.

SAFEGUARDING & CODE OF CONDUCT STRUCTURE



Graphic 3

In 2023, these structural and resource developments have been continuously supported by the Global PSEAH Task Force. The purpose of the PSEAH Task Force is to strengthen DRC’s commitment to prevent and respond to SEAH concerns and to guide DRC in developing a more compliant, protective and holistic approach to address PSEAH. Specifically, the objectives of the PSEAH Task Force are to:

- i) Inform DRC on the way forward to immediately address identified PSEAH gaps in line with donor requirements,
- ii) Advise DRC on actions to strengthen DRC’s PSEAH efforts within the available resources and by examining additional resources required for future investments,
- iii) Advise and provide technical guidance to the Safeguarding (PSEAH) Global Advisor,
- iv) Support PSEAH mainstreaming across DRC, at all levels, in accordance with the PSEAH-related needed actions, which form part of a Safeguarding (PSEAH) action plan.

In September 2023, DRC issued its Global PSEAH Policy. Its purpose is to define and promote an organizational culture of accountability, respect, and equality, that protects the people DRC work with or come into contact with, from SEAH incidents (e.g. DRC's Workforce, partners, service providers, Persons of Concern and anyone DRC engages with through its programmes and activities). In line with DRC's vision, mission and values, DRC's Code of Conduct and international standards, the PSEAH Policy provides guidance and establishes DRC's institutional commitment and responsibility and a clear set of rules for DRC's Workforce and partners when it comes to PSEAH. The Policy offers essential insights into various aspects of PSEAH such as:

- i) DRC's approach to (P)SEAH terminology,
- ii) the relationship between this PSEAH Policy and DRC's Policies for ethics and conduct,
- iii) understanding the terminology and DRC's responsibility regarding PSEAH and GBV cases,
- iv) distinguishing between 'victim' and 'survivor', and importantly
- v) a deep dive into DRC's 'survivor-centered approach' ("SCA") from the SEAH perspective, explored through four stages: disclosure of SEAH incident, RSM handling, referral to support, and investigation.

DRC's Global PSEAH Policy release in 2023 was accompanied with a comprehensive roll-out plan which implementation started in the last quarter of 2023 notably with awareness activities directed at country and regional management level in order to enhance clarity regarding their own roles and responsibilities.

Since June 2023, the Safeguarding & Code of Conduct teams at HQ and Regional levels have also engaged with DRC's Safety Unit and systematically facilitate a session regarding the prevention of sexual violence and the understanding of its precursors as part of DRC's HEAT trainings.

DRC PSEAH Visions & Priorities

As part of the roll-out of the Global PSEAH Policy, DRC communicated internally about its Visions & Priorities.

DRC's vision is to set a PSEAH framework that not only prevents incidents but also enables individuals to report with confidence and ensures a timely and survivor-centred response. DRC aims to create an organizational culture that values respect, dignity, and safety, where PSEAH is openly discussed, and all stakeholders are actively engaged in its prevention and response.

DRC holds sexual harassment, exploitation and abuse to constitute particularly egregious forms of misconduct, not least because of the severe impact such misconduct can have on survivors. A specific focus on SEAH misconduct related data is accessible in this report below and it reflects the importance DRC assigns to tackling it.

IV. Professionalisation of Internal Investigations

In 2023, DRC has maintained the agenda engaged in 2022 towards the professionalisation of internal investigation by rolling out its own internal investigation training scheme and by developing an online version of the training to increase its reach to remote operations.

DRC in-house Fraud & Corruption investigation training scheme is in line with the Book of Knowledge on PSEAH investigations developed by the CHS. The training scheme is composed of three (3) parts, a requirement to take DRC's Code of Conduct and CHS's Foundation of SEAH investigations online trainings, a four (4)-day workshop in person, and a moot interview in relation with one of the case scenarios studied during the in-person workshop.

During the in-person workshop, participants are trained on the following topics through multiple case scenarios:

- i) Session 1: Identifying the elements of an allegation,
- ii) Session 2: Planning an investigation,
- iii) Session 3: Collecting evidence,
- iv) Session 4: Conducting an interview,
- v) Session 5: Assessing evidence,
- vi) Session 6: DRC's Survivor Centred Approach,
- vii) Session 7: Reporting on investigations (incl. Donor reporting)

This investigation scheme has been piloted twice in the East-Africa & Great Lakes (Kenya) and Asia & Europe (Poland) regions during 2022 which resulted in the training of forty (40) new investigators and one (1) trainer. In 2023, the training was facilitated in the West Africa North Africa and Latin America (Senegal, Tunisia, Colombia), the East-Africa & Great Lakes (Kenya), and Middle East (Amman) regions as well as in DRC's Headquarters. In 2023, seventy-two (72) additional staff have been trained as investigators and three (3) as trainers. An online version of this training was also launched and piloted in December 2023 to increase the reach in remote areas.



V. CoCRM Data Analysis

The data for this report was extracted from the system on 20th February 2024. For the first time, the number of RSMs has slightly decreased. It can be noted that the number of SEAH allegations has not followed this trend and has remained steady. The number of investigations has also remained steady while the time taken to investigate RSMs is decreasing, which evidences the new and more professional approach DRC is taking to maintain a fully functional complaint mechanism, to investigate and to refer to management minor misconducts in a timely manner.

Number of Registered RSM

DRC received 618 reports in 2023 compared to 654 in 2022 which represents a 5,5 % decrease in reporting. It is the first time since 2014 that the upward trend in reporting is not observed.

Gate (Level)	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
A (Country)	100	82	135	143	254	285	318	365	391	131
A+ (Regional Office)				6	8	15	24	29	36	258
B (HQ)	3	23	56	78	103	149	176	188	227	229
Total	103	105	191	227	365	449	518	582	654	618

Table 2

The slight decrease in number of RSMs received between 2022 and 2023 is a probable consequence of the efforts produced to ensure that minor workplace issues are first presented to management and/or HR. However, the number of severe misconducts remains steady (see below) evidencing that the intake of RSMs has reached a level more equal to the effort invested into outreach and development. The level of maturation of the mechanism should not obscure the fact that the ability to adapt to local contexts is as important as to build a well-structured mechanism.

As the following table shows, there are still some country operations (Djibouti, Equator, Georgia, Mali, Serbia) and offices (Senegal and Denmark) which register a limited number of RSMs or none (Algeria, Burundi, Italy, Moldova, Romania, Tunisia):

Country	A (Country)	A+ (Regional Office)	B (HQ)	Total
Yemen	11	36	21	68
Colombia	52	5	8	65
Iraq	11	30	22	63
DR Congo	4	13	24	41
Afghanistan	8	8	13	29
Myanmar	7	11	7	25
Tanzania	13	9	2	24
Ukraine		11	12	23
Nigeria		13	9	22
Somalia	4	11	7	22
Central African Republic	3	16	2	21

Bangladesh		9	10	19
Lebanon	3	6	7	16
Bosnia and Herzegovina	1	8	6	15
Jordan		7	6	13
Kenya	2	8	3	13
Turkey		3	10	13
Uganda	2	5	6	13
Libya		6	6	12
Niger		7	5	12
South Sudan	2		10	12
Ethiopia	6	2	3	11
Mexico		3	8	11
Greece	1	4	4	9
Cameroon		4	2	6
Syria		5	1	6
Venezuela		4	2	6
Burkina Faso		4	1	5
Poland		4	1	5
Sudan	1		4	5
Senegal		1	3	4
Denmark			3	3
Mali		2		2
Djibouti		1		1
Equador			1	1
Georgia		1		1
Serbia		1		1
Total	131	258	229	618

Table 3

This low number of reports can be explained by the fact that some countries or office do not implement activities directly (Senegal) or implement activities indirectly only (Equator, Italy), by the size and/or activity shift of the operation (Algeria, Georgia, Moldova, Romania, Serbia, Tunisia) or by the fact that the CoC & CoCRM were implemented only recently (Denmark).

Out of the 618 RSMs received in 2023, 135 were still open at the date of the data collection, the vast majority being opened at Gate A+ (Region) level, which has inherited from the case load open at Gate A (Country) level in the previous structure:

Number of Registered RSM - By Status & Gate				
Status	A (Country)	A+ (Regional Office)	B (HQ)	Total
Closed	103	162	218	483
Open	28	96	11	135
Total	131	258	229	618

Table 4

Type of Reported Misconduct

« Fraud & Corruption » remains the primary type of misconduct reported, which is most likely due to its very broad definition¹. It has slightly increased in terms of proportion and now represents 25% of the types of misconduct reported (compared to 22,6% in 2022 and 27,5% in 2021). While « SEAH » now represents 8,3% of the types of misconduct reported (compared to 9,7% in 2022), they continue to be a very important workload for the investigators at Gate B (HQ) level, and an important area of attention for DRC.

When reading the below table, it must be kept in mind that the data of the below table presents the number of instances certain types of misconduct (e.g. “Fraud & Corruption”) are used to tag RSMs at the moment of their registration in the system. In 2023, the first five types of misconduct are exactly the same as in 2021 and 2022 (in the same order except for “breach of duty” and “Abuse of authority” which have interchanged positions).

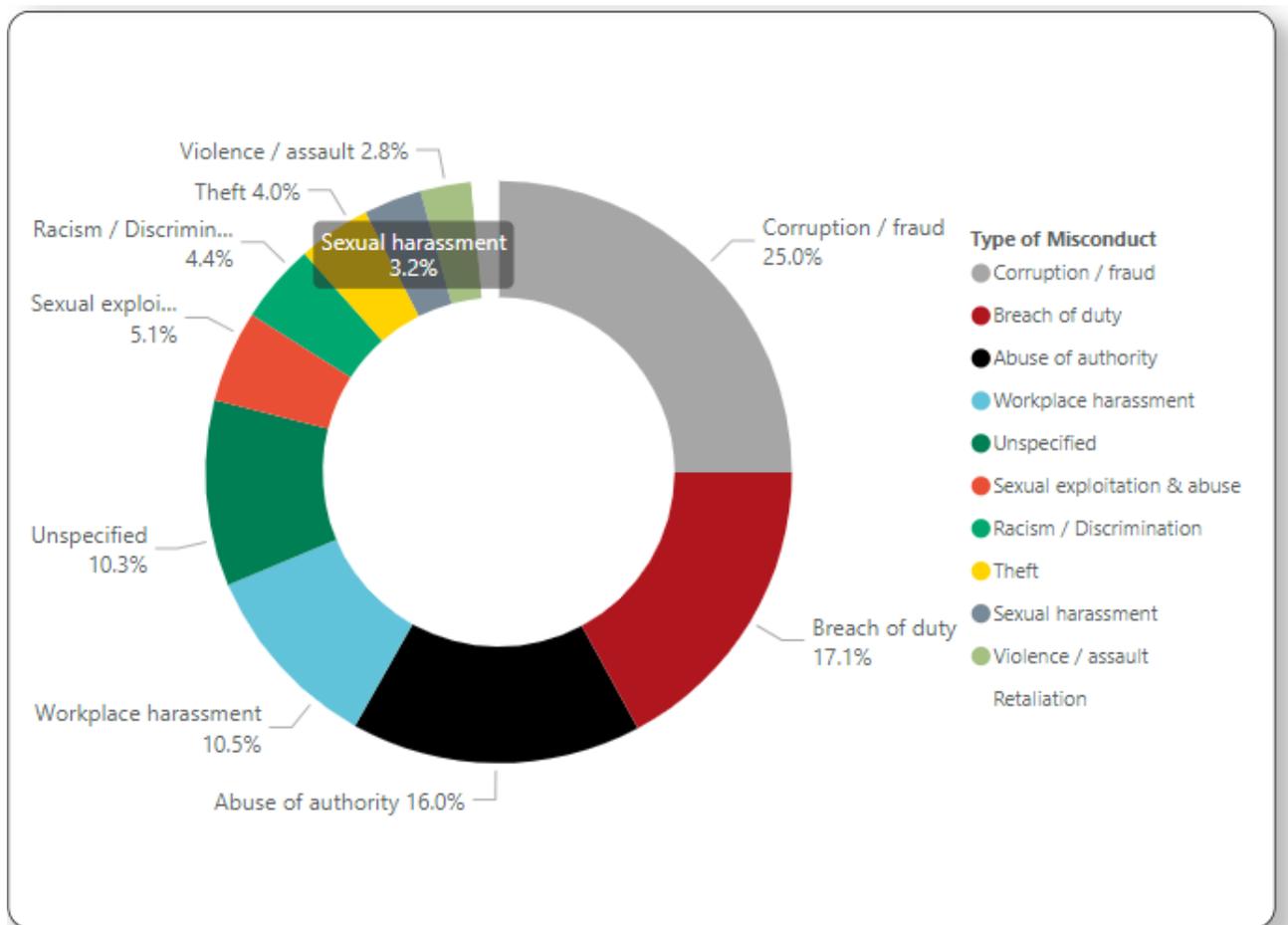


Chart 2

¹ Fraud & Corruption is defined by DRC’s Anti-corruption policy as: “The actual misuse or attempt misuse of entrusted power for private gain. Private gain includes personal and other’s gain. Corruption (and Fraud) includes attempted and completed acts of corruption, both monetary and non-monetary corruption, and is not limited to interactions with public officials” (ex: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favouritism - e.g. nepotism and cronyism -, extortion, embezzlement, forgery, financial fraud, and procurement fraud).

Type of Reporting Persons

It is encouraging to observe that so many reports come from Programme Staff in International Operations because DRC is relying upon them to report suspicions of misconduct in the field and remote areas. Management in International Operations is now the second category (third in 2022). It evidences their trust and adhesion in the CoCRM, which is essential to ensure that it is adequately promoted within the organisation.

The Persons of Concern & Beneficiaries are now the sixth highest type of Reporting Person (fourth highest 2022)². It is likely that this decrease is a consequence of DRC's strategy to promote the local CFM towards Persons of Concern & Beneficiaries to foster contextualisation and inclusion efforts. Their reports relating to staff misconduct are thus referred to the CoCRM via a staff member (who will be registered as the Reporting Person) or through the local CFM. In 2023, 16,5% of all RSMs (102) were reported by Persons of Concern & Beneficiaries directly or indirectly. There nevertheless remains a need for a continuous organisational effort towards building Persons of Concern's awareness of the CoCRM as well as ensuring their safe and trusted access to the CoCRM or the CFM.

A significant proportion of the RSMs are anonymous reports. These are often linked to fear of retaliation. This observation demonstrates the need to increase trust in both the CoCRM and the management ability to prevent and respond to instances of retaliation. Anonymous reports are often difficult to process because the reporting person(s)' lack of willingness to participate, to provide specific details or legitimate means of contact. This can effectively prevent the intake committee and the investigative team from collecting all necessary information, potential evidence and leads.

Profile of Reporting Persons - By Gate				
Reporting Person Type	A (Country)	A+ (Regional Office)	B (HQ)	Total
Int. Op. - Current Programme Staff	42	110	26	178
Int. Op. - Current Management	14	45	55	114
Int. Op. - Current Support Staff	22	35	38	95
Anonymous / Unknown	24	15	37	76
Other External Stakeholder	10	15	25	50
Persons of Concern - Beneficiaries	8	20	5	33
Int. Op. - Former Programme Staff	3	9	10	22
Int. Op. - Former Support Staff		3	11	14
Vendor	4	1	6	11
(I)NGO	1	2	5	8
Donor	1	1	4	6
HQ / DK - Current Management			3	3
Implementing Partner	2	1		3
Int. Op. - Former Management			3	3
HQ / DK - Current Staff			1	1
Public Authority		1		1
Total	131	258	229	618

Table 6

² Persons of Concern & Beneficiaries are the second highest source of reports after staff.

Type of Alleged Subjects

In 2023, Current Programme Staff in international operations had the highest number of complaints against them, with current Support Staff and Current Management coming in after that. It is noticeable that Management is mostly complained about at Gate B (HQ) level. However as expected, Gate A+ (Region) level has received a significant share of reports involving Management which can be confidently inferred to be a consequence of the restructuring of the CoCRM. This was indeed an objective of the restructuring to increase confidence in the CoCRM by geographically distancing the intake process from the local management.

Profile of Subject - By Subject Type & Gate				
Subject Type	A (Country)	A+ (Regional Office)	B (HQ)	Total
Int. Op. - Current Programme Staff	67	101	24	192
Int. Op. - Current Support Staff	42	49	52	143
Int. Op. - Current Management	17	31	73	121
Unidentified	10	55	52	117
Incentive workers/volunteers/irregular - Current	9	23	13	45
Implementing Partner	6	17	10	33
Not Subject to CoC	7	10	6	23
HQ / DK - Current Management			10	10
Int. Op. - Former Programme Staff	3	6	1	10
Int. Op. - Former Support Staff	3	2	1	6
Int. Op. - Former Management		1	4	5
HQ / DK - Current Staff	1			1
Incentive workers/volunteers/irregular - Former		1		1
Total	165	296	246	707

Table 7

The increasing number of reports made involving Implementing Partners, and persons “Not Subject to [DRC’s] Code of Conduct” is most probably evidence of DRC’s efforts in terms of communication towards partners and external stakeholders, but it also shows that DRC is better at capturing reports involving partners and that DRC’s CoCRM may also be perceived as a trusted mechanism in countries and locations where DRC operates.

Intake Committees Determinations

Following the restructuring of the CoCRM in 2022, all RSMs are now processed by Intake Committees at either Gate A+ (Region) or Gate B (HQ). In 2023, the restructuring was not fully rolled-out in all regions. Some Intake Committees were still in place at Gate A (Country) level.

Intake Committees have limited response options (see chart below). The restructuring of the CoCRM introduced a segregation between types of “Referral to Management” (for information, for minor misconduct and for immediate action) in order to better inform Reporting Persons and Relevant Management in charge about the expected follow-up. « Referral to Management for Minor Misconduct » (37% compared to 35% in 2022) remains the most decided response to RSMs. Although the new Code of Conduct is expected to clarify that minor misconducts are likely to be referred to Management by Intake Committees, the important number of such determination highlights the need to continue spreading awareness on how to best utilise the CoCRM.

« Investigation » (19% compared to 23% in 2022) remains the second type of Intake Determination. The number of investigations decided by Intake Committees is steady since 2021 (139 in 2021, 137 in 2022, 136 in 2023) and it has therefore not followed the overall decrease of reports observed in 2023 (see above).

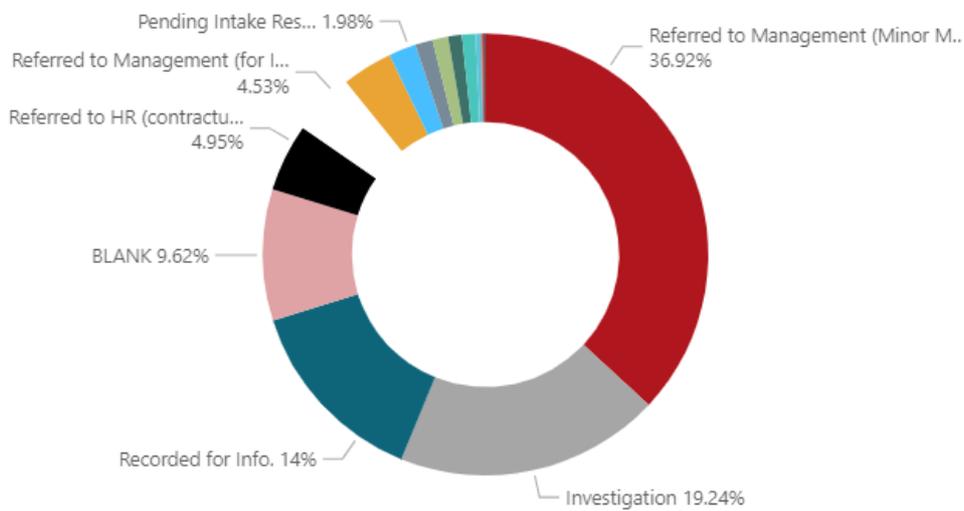


Chart 3

Outcomes of Investigations

The proportion of proven cases out of the total number of investigations open in 2023 and closed at the time of extraction is 38% (thirty-three (33) proven investigations of eighty-three (83) closed- see Table 8 below). When including the investigations which are still open to date, the substantiation rate is 24% (see Chart 4 below).

Report Type	Investigations
Not Proven - Closure Report	53
Ongoing	50
Proven - Investigation Report	33
Total	136

Table 8

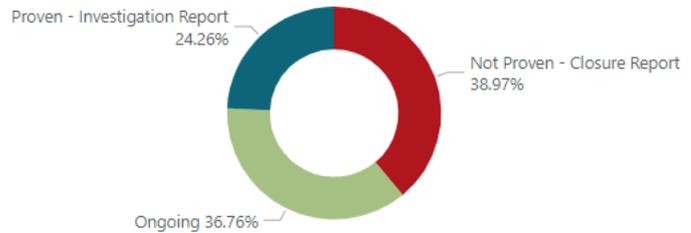


Chart 4

Substantiation, as such, is not a goal for DRC, while ensuring consistent due process and fair investigations in application of DRC’s principled CoCRM framework and Investigation Guidelines is a top priority. An investigation is a very resource-demanding process that should be administered with care. DRC therefore seeks to analyse and explain where there is a significant drop in substantiation rate (which is not the case in 2023).

Investigation & Case Closure Times

The Investigation Closure Time is the time spent from the date of receipt of the RSM until the date the report on investigation (proven or not proven) is sent to the Management in charge of following up with eventual disciplinary and/or programmatic actions where applicable.

In 2023, the average Investigation Closure Time has decreased by 9,7% from 2022 to 2023 (after an increase of 5,7% from 2021 to 2022) as mentioned above in this Annual Report as a consequence of the recent efforts to streamline the CoCRM process and to professionalise the conduct of investigations.

Investigation Closure Time Complaint received ---> Report Date		
Gate	Average Days	Median Days
A (Country)	70	64
A+ (Regional Office)	88	92
B (HQ)	90	84
Total	84	81

Table 8

In order to better inform internal stakeholders (staff and management) and in an effort to uphold transparency and accountability, DRC has also revised its methodology regarding Case Closure Time. The Case Closure Time is the time spent from the date of receipt of the RSM until the date the management in charge of following-up has taken action (disciplinary and/or programmatic). This methodology allows for assessment of the time it takes for the management in charge to actually follow-up after a referral is made to them or after an investigation has been reported, and hence assess how to better equip management in this task while building on accountability. For that purpose, two (2) different Case Closure Times are now scrutinized:

- i) Case Closure Time when an investigation was decided by the Intake Committee (from the date of receipt of the RSM until the date of the Management follow-up action),

Case Closure Time - (IC Decision = Investigation) Complaint received ----> Management Decision Date		
Gate	Average Days	Median Days
A+ (Regional Office)	120	130
A (Country)	142	111
B (HQ)	120	108
Total	123	111

Table 9

- ii) Case Closure Time when no investigation was decided by the Intake Committee (from the date of receipt of the RSM until the date of the Management follow-up action).

Case Closure Time Complaint received ----> Management Decision Date		
Gate	Average Days	Median Days
B (HQ)	85	59
A (Country)	66	34
A+ (Regional Office)	45	30
Total	65	43

Table 10

Highlight on SEAH Data

DRC holds sexual harassment, exploitation and abuse (SEAH) to constitute particularly egregious forms of misconduct, not least because of the severe impact such misconduct can have on survivors. The specific focus on data related to these forms of misconduct here reflects the importance DRC assigns to tackling it.

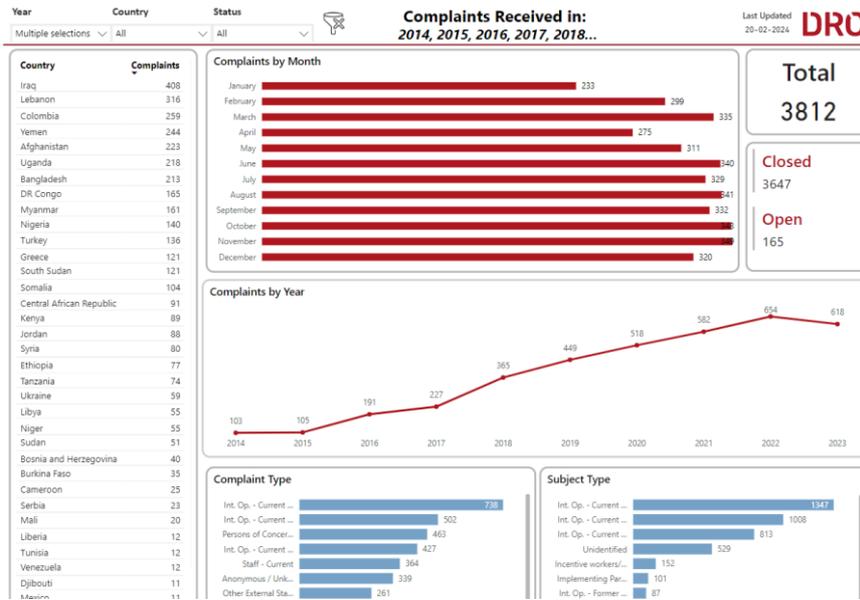
Key 2023 take-aways

- Sexual Harassment (SH) represents 39% of all SEAH allegations received in 2023 (3,2% of all allegations), compared to 61% for Sexual Exploitation & Abuse (SEA) together (5,1% of all allegations). The same proportions are observed in the CHS Harmonized Reporting Scheme 2023(the “CHS Report”).
- Alleged Survivors are female in 96% of all SEAH incidents (84% in the CHS Report), and 10% are children (19% in the CHS Report). 54% of Survivors were identified as Persons of Concern (incl. DRC irregular workers) compared to 33% as DRC full-time employees.
- Alleged Subject were males in 96% of all SEAH incidents (68% in the CHS Report), 67% were identified as belonging to DRC’s Workforce (incl. irregular workers) and 24% were identified as holding managerial responsibilities (25% in the CHS Report).
- 76% of all SEAH RSMs received in 2023 were reported in the CoCRM by members of DRC’s Workforce, and 8% were reported by Persons of Concern directly, but 23% of all RSMs containing SEAH allegations were initially disclosed by Persons of Concern (to the CFM, staff members, etc.).
- Out of the seventy-five (75) cases containing SEAH allegation, forty-five (45) have been subject to an investigation (47 in 2022), six (6) to a further Preliminary Assessment, and four (4) were referred to management for immediate action in view of the available and compelling evidence of breach. The remaining were notably referred to management, or referred to another organisation.
- Out of the fifty-five (55) cases for which an investigation, a preliminary assessment or a referral for immediate action was decided, eleven (11) are still open to date (20%), fifteen (15) are proven (27%), and twenty-nine (29) are not proven (53%).

DRC Goes Public with CoCRM Data

DRC continues to make CoCRM data available to the public via its CoCRM External Dashboard. In 2022, the CoCRM Dashboard was refreshed to facilitate its reading by the public and ensure it is updated on a daily basis. It can be accessed via the Code of Conduct page of DRC’s website ([Code of Conduct | DRC Danish Refugee Council](#)) or using the link here ([Microsoft Power BI](#)).

The data presented in this CoCRM External Dashboard are updated and discrepancies with the present Safeguarding & Code of Conduct Annual Report data may therefore be observed.



Screenshot of the CoCRM External Dashboard dated 20 February 2024



Founded in 1956, the Danish Refugee Council (DRC) is Denmark's largest international NGO, with a specific expertise in forced displacement. DRC is present in close to 40 countries and employs 7,500 staff globally.

DRC advocates for the rights of and solutions for displacement-affected communities, and provides assistance during all stages of displacement: In acute crisis, in exile, when settling and integrating in a new place, or upon return. DRC supports displaced persons in becoming self-reliant and included into hosting societies. DRC works with civil society and responsible authorities to promote protection of rights and inclusion.

Our 6,200 volunteers in Denmark make an invaluable difference in integration activities throughout the country.

DRC's code of conduct sits at the core of our organizational mission, and DRC aims at the highest ethical and professional standards. DRC has been certified as meeting the highest quality standards according to the Core Humanitarian Standard on Quality and Accountability.

HRH Crown Princess Mary is DRC's patron.

To read more about what we do, see: www.drc.ngo

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