

The CISU Code of Conduct

# THE CISU – CIVIL SOCIETY IN DEVELOPMENT CODE OF CONDUCT – UPDATED FEBRUARY 2020



## Contents

<b>1</b>	<b>Introduction</b>	<b>3</b>
1.1	Background	3
1.2	A dynamic document	3
1.3	Target groups and terminology	3
1.4	Information for members and the surroundings	4
1.5	Preventing breaches of the Code of Conduct	4
1.6	Consequences of violating the Code of Conduct	4
1.7	CISU's Statutes, strategic basis and values	4
1.8	CISU management	5
1.9	Quality assurance	5
<b>2</b>	<b>Ethical principles and guidelines</b>	<b>7</b>
2.1	Fundamental ethical principles	7
2.2	Translating the ethical principles	8
<b>3</b>	<b>Safeguarding (SHEA)</b>	<b>9</b>
3.1	Definition:	9
3.2	Safeguarding against sexual harassment, exploitation and abuse	9
3.3	Prevention of sexual exploitation and abuse of power	10
3.4	Reports on sexual exploitation and abuse of power	11
3.5	Follow-up	12
<b>4</b>	<b>Legal principles and guidelines</b>	<b>13</b>
4.1	Legal basis	13
4.2	Key legal principles	13
4.3	Principles relating to processing of personal data	16
4.4	Working procedure consequences	18
<b>5</b>	<b>Anti-corruption and irregularities</b>	<b>21</b>
5.1	Target group	21
5.2	Objective: to avoid corruption, fraud and abuse altogether	21
5.3	Definitions	21
5.4	CISU	23
5.5	Member organisations	23
5.6	Grant holders from CISU's funding schemes	23

<b>6</b>	<b>Security</b> .....	<b>25</b>
6.1	General security .....	25
6.2	Security when travelling abroad .....	26
<b>7</b>	<b>Complaints and reporting systems</b> .....	<b>27</b>
7.1	Areas covered .....	27
7.2	Filing and processing complaints.....	28

## 1 INTRODUCTION

### 1.1 Background

This Code of Conduct is a compilation of CISU's principles, guidelines and business practice for key areas in CISU's day-to-day activities.

It is based on CISU's values and experience as an accountable and transparent management and capacity-building organisation. Transparency and orderly administration are always at the heart of CISU's work. With this background, this document is to help CISU to carry out its work and achieve its goals as an example to others.

Most of the document has been written in an easy-to-read format. However, as it also serves as an administrative and a legal basis for CISU, some of the language has a certain level of complexity.

Anyone is welcome to make suggestions to improve the document and its implementation.

### 1.2 A dynamic document

The document is dynamic, meaning that regular updates can be made to the document as a result of changes in context, new knowledge, new regulations and/or changing needs.

The document is reviewed and updated in 1<sup>st</sup> quarter each year. Substantial changes will be approved by CISU's Board.

CISU's management will set up a plan for regular monitoring, ensuring implementation of actions laid down in this document. A Code of Conduct group is established under the secretariat to support the secretariat management in establishing, following and monitoring the plan. The group will provide input for discussions in January and for CISU's monitoring, evaluation and learning system.

CISU received external legal assistance for the key parts of the document. The need for legal assistance in connection with adjustments to the document or where it is implemented will be continuously assessed.

CISU cooperates with other Danish organisations on various aspects concerning this document. The aim of this cooperation is to gather, exchange and apply knowledge and experience. In 2019, special focus was on improving practice regarding safeguarding (section 3).

### 1.3 Target groups and terminology

The primary target group for the document is CISU's own organisation. This means CISU's Board, CISU's employees (secretariat staff, secretariat management, contracting external consultants, including assessment consultants, members of CISU's assessment committee and steering committee in the Danish Emergency Relief Fund (DERF)). These are all referred to using the term "**CISU**". The persons above confirm that they are familiar and comply with this Code of Conduct via contracts and agreements concluded.

CISU's **management** is composed of **CISU's Board** and the **secretariat management**. Specific target groups will be identified in the document.

The secondary target group involves other stakeholders who have a contractual relationship with CISU, and includes all people, institutions, companies and organisations cooperating with CISU, i.e. who receive

funding from CISU to perform a task, provide a service, or to raise awareness, or carry out development work and/or humanitarian work. The provisions described in this Code of Conduct only directly cover other stakeholders than CISU, where specific parts of the Code of Conduct have been stipulated in mutual agreements, grants contracts or similar, or where there are general criminal or actionable matters pursuant to Danish legislation or other Danish regulations. Indirectly, these stakeholders are a target group at invitation level (e.g. in our material, dialogue and capacity-building services). The term "**other stakeholders**" is used in this respect.

### **1.4 Information for members and the surroundings**

The annual report ("*Status og Perspektiver*") to the CISU Annual General Meeting includes a section on use and compliance with CISU's Code of Conduct. The section contains an overview of any material breach of the Code of Conduct, with due regard for the protection of personal data.

Cases regarding corruption (C-cases) and material cases regarding breach of the safeguarding principles are regularly published on CISU's website with due regard for the protection of personal data.

CISU urges all member organisations, grant holders, their partners and other stakeholders to follow the same principles as in this document and to prepare their own basis for doing so, adjusted to the nature, size, etc. of the organisation.

### **1.5 Preventing breaches of the Code of Conduct**

Through information and dialogue, the CISU management will do its utmost to make the stakeholders familiar with their responsibility within this Code of Conduct in relation to their roles. Key stakeholders within the different themes will be trained, where necessary, to act in accordance with the Code of Conduct and to guide other stakeholders in this respect.

### **1.6 Consequences of violating the Code of Conduct**

Breaches or violations of the provisions and intentions of this Code of Conduct will be met with reactions corresponding to their nature, scope and severity - ranging from recommendations and requirements to actual sanctions:

CISU will be able to impose various types of sanctions against persons, companies or organisations that have seriously violated this Code of Conduct, for example disciplinary measures against their own employees and contracting parties (warning/dismissal or exclusion), suspend membership for member organisations, (immediately) terminate contracts with grant holders and suppliers, file a police report in criminal matters. CISU can claim compensation for damage suffered.

### **1.7 CISU's Statutes, strategic basis and values**

CISU is a Danish civil society organisation with a traditional association structure based on a set of statutes. CISU's role and work are directed by a four-year strategy, with annually defined specific themes that are adopted at the Annual General Meeting, and by a series of associated documents and recommendations adopted by CISU's Board.

CISU enters into agreements with external donors focusing on capacity building, fund management, and communication to support popular participation and civil society interventions in international

development and relief cooperation in the broadest sense to comply with human rights and to implement the UN Sustainable Development Goals. CISU independently safeguards the interests of member originations within civil society participation in this work.

### **CISU's fundamental values (adopted in 2016)**

The values underpin our day-to-day work. They make up the framework for how we view the world and engage in relations. Our credibility demands that we are clearly seen to adhere to our own values.

#### **Diversity**

We wish to ensure a wide array of approaches to civil society work, because differences in methodologies and types of stakeholders are the hallmark of a thriving civil society

#### **Transparency**

We strive for transparency in all our actions and decision-making

#### **Accountability**

We take responsibility for our own actions and decisions, and we expect others to do the same

#### **Participation**

We offer everyone an equal opportunity to join in, because everyone has something valuable to contribute

#### **Respect**

We deal with people on their own terms, supporting them in pursuing their own goals. We welcome challenges to our viewpoints and opinions, always learning along the way.

#### **Cooperation**

We cooperate with a wide range of stakeholders, because this is an inspiring, necessary and constructive path to sustainable results

#### **Volunteering**

We create space for voluntary involvement in civil society, because people's free will and volunteering drives commitment to civil society work

## **1.8 CISU management**

The management at CISU is described in general in the Statutes. CISU's overall management between Annual General Meetings is the Board. The secretariat is managed by a management team employed by the board. Management by CISU's Board and a number of management principles are described in a separate - annually updated - document adopted by the Board.

A more detailed organisation description of CISU is available and is updated annually.

## **1.9 Quality assurance**

CISU has an extensive system of guidelines, recommendations, procedure and process descriptions and formats that form the basis for ensuring high-quality performance of tasks in all areas. Quality is monitored - and systems are adjusted - regularly by the respective groups/group coordinators in the secretariat that refer to the management, with a status to the Board at least twice a year. Moreover, at the end of each semester, the semester is summarised, and the next semester is planned internally by the secretariat.

## Code of Conduct

CISU has prepared a basis for its four principal areas of intervention (management, capacity building, communication and development cooperation). Specifically, CISU's fund management is based on clear and transparent guidelines approved by the Board and by donors. The guidelines form the basis for a professional, highly qualified overall assessment in a separate, independent assessment system.

CISU's normative and management documents are built around the basic terms of this Code of Conduct.

## **2 ETHICAL PRINCIPLES AND GUIDELINES**

### **2.1 Fundamental ethical principles**

CISU's ethical principles build on CISU's values as described above: Diversity, Transparency, Accountability, Participation, Respect, Cooperation and Volunteering. These are our ethical foothold and reflect a human rights-based approach, including the PANT principles (Participation, Accountability, Non-discrimination and Transparency). The following sections clarify some of the values and how they can be translated into ethical principles in our work.

#### **2.1.1 Transparency and confidentiality**

CISU strives for maximum transparency with regard to our member organisations, donors, partners, the press and the public. Transparency should be practiced with respect for our obligation to maintain secrecy in relation to personal situations, privacy and personal or sensitive data on member organisations or their partner organisations emerged through advisory services, courses, etc. The regulations on transparency and confidentiality are described in CISU's legal guidelines supplemented by our data protection policy and processing of personal data.

#### **2.1.2 Successful cooperation and social conventions**

CISU will promote good working relationships and appreciative and constructive social conventions. This is the case among colleagues, between political/administrative management and employees, in political bodies and with regard to members, partners, the press and the surroundings.

#### **2.1.3 Non-discrimination**

In CISU's work and as an organisation, we respect other people. We do not discriminate on grounds of gender, race, ethnic origin, sexual orientation, religion, culture, age, education, social status or nationality.

#### **2.1.4 Zero-tolerance of abuse of power, position or resources**

At CISU, we will not promote our personal interests to any individuals, businesses or organisations by using our position in CISU to influence them or offer them favours. Similarly, we will not use CISU's resources, premises or equipment for personal purposes without permission.

CISU sets up systems to ensure, as far as possible, that no one is exposed to discrimination or abuse of position. Read more about zero-tolerance in the separate section on Safeguarding.

#### **2.1.5 Real and potential conflicts of interest**

At CISU, we will avoid any conflict between our own interests and the interests of CISU which may affect - or give the impression of affecting - the impartial performance of tasks. Private interests cover any advantages that cater for us, our family, friends, business relationships or organisations to which we are affiliated.

#### **2.1.6 The humanitarian principles and Core Humanitarian Standard**

All CISU's relief activities are guided by the four humanitarian principles: Humanity, Neutrality, Impartiality and Independence, and are based on the Core Humanitarian Standard. These principles are key in

establishing and maintaining access to people affected by crisis; both in humanitarian and fragile situations. This is why we demand that our grant holders in the Danish Emergency Relief Fund (DERF) comply with the principles.

## **2.2 Translating the ethical principles**

### **2.2.1 Translation into day-to-day work of the organisation**

Impartiality: Everyone at CISU is obligated to inform the secretariat management and the Board about real or potential conflicts of interest. Moreover, they are required to declare themselves disqualified in discussions and decisions where there may be reasonable doubt as to their impartiality. For employees, members of the assessment committee and consultants, matters of doubt are resolved by the secretariat management, and for the management, by chairpersons, and for chairpersons, by the Board.

At CISU, we will not give, pass on or receive directly or indirectly any gift or other favour that may influence our impartiality or performance of tasks. This does not include small gifts such as meals and ordinary gifts in connection with birthdays and anniversaries. Minor gifts and gratuities that we receive in connection with performance of our paid work for CISU (e.g. consumer goods in connection with a presentation) belong to the workplace and are shared by all employees.

CISU's anti-corruption policy contains a detailed approach to addressing corruption (see section 5).

### **2.2.2 Reporting unacceptable circumstances**

If we discover - or have reason to suspect - unacceptable circumstances such as sexual exploitation, abuse of power or corruption in our own organisation or at our grant holders or their partners, we are obligated to disclose this information to CISU's management. Entry points for reporting feedback, unacceptable circumstances and processing complaints are described in section 8. The section also includes a description of how CISU protects employees in whistleblowing cases.

### **2.2.3 Translating ethical guidelines in connection with business trips**

For business trips outside Denmark, we commit ourselves to living up to the ethical and professional ideals and standards that we seek to promote among our members, grant holders and in their partner organisations throughout the world.

Note that we never compromise our own safety, for example in connection with extortion or threats. Such situations must be reported immediately to CISU's secretariat management.

### 3 SAFEGUARDING (SHEA)

**Note:** We will continue work on this section in collaboration with a group of Danish organisations. Through this collaboration headed by Global Focus, we commit ourselves to continuously learning and improving our guidelines for protection against sexual exploitation and abuse of power. The guidelines may therefore be updated several times in the coming years.

#### 3.1 Definition:

CISU uses the wording Sexual harassment, exploitation and abuse (SHEA). The UN defines these as follows:

- Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Other forms of abuse than sexual abuse are not covered by this section on Safeguarding, but are included in other sections of CISU's Code of Conduct, including anti-corruption.

**The Danish Criminal Code:** Chapter 24 of the Danish Criminal Code concerns sexual offences. The most important sections are:

Sections 226, 232, 234 and 235 on indecent exposure (exhibitionism, groping, voyeurism, verbal indecency) and recording, possession and dissemination of photos/films etc.

Section 216 on rape.

Sections 219, 222, 223, 224 and 225 on sexual violence against children and young persons.

Sexual harassment, exploitation and abuse (SHEA) committed in countries outside Denmark by persons living in these countries fall under the criminal code of the relevant countries.

Source: <https://www.retsinformation.dk>

#### 3.2 Safeguarding against sexual harassment, exploitation and abuse

All people are entitled to a life without sexual harassment, exploitation and abuse. CISU's zero-tolerance to this has been stipulated in Danish criminal law. CISU does not tolerate sexual harassment, exploitation or abuse, whether internally or externally, among anyone associated with our work. CISU's focus is therefore that all parts of our organisation actively contribute to protecting the people involved with CISU directly or indirectly through our member organisations, grant holders and partners.

Based on human dignity and the right to live in safety, CISU actively works against sexual exploitation and abuse of power. This work is described here in our approach to Safeguarding, which builds on our ethical principles and also refers to several parts of this Code of Conduct.

CISU prevents both potential sexual exploitation and potential abuse of power and takes immediate action in cases of abuse or suspicion of abuse. CISU follows up on all cases in order to sanction, protect, help and learn.

In dialogue with an internal Code of Conduct group, an employee representative and a health and safety representative, CISU's management is to ensure that CISU's guidelines, prevention and practice regarding

safeguarding enable CISU to protect people who are directly or indirectly involved with CISU and to provide the required legal safeguards for all parties.

### **3.3 Prevention of sexual exploitation and abuse of power**

#### **3.3.1 At CISU**

CISU supports an open and safe environment, in which the dignity of all employees is respected and in which the organisation's ethical guidelines to protect human rights are followed. At CISU, everyone is obligated to help develop and maintain an open and safe working environment. CISU's management is responsible for ensuring the framework do so. As an organisation and a workplace, we are therefore committed to ensuring a working environment in which respect for human rights and dignity can thrive and in which no one is exposed to any form of harassment, exploitation or abuse.

CISU's management ensures that all individuals know their responsibilities and rights as well as the guidelines for how we deal with safeguarding at CISU.

The annual discussions on how to use the Code of Conduct include how CISU regularly monitors and learns how to best protect against sexual exploitation and abuse of power.

In dialogue with the Code of Conduct group, the secretariat management ensures that the necessary competences for safeguarding are present at CISU and that these competences are developed through external cooperation and, where necessary, with support from external experts.

#### **3.3.2 Employees and members of assessment systems**

Safeguarding is a natural element when recruiting new employees and members of assessment systems. All job advertisements refer to this Code of Conduct. Safeguarding can also be included in connection with obtaining references from previous jobs, if deemed necessary.

New employees and members of the assessment committees are introduced to CISU's guidelines for safeguarding against sexual harassment, exploitation and abuse when they are introduced to CISU's Code of Conduct.

CISU's Code of Conduct, including guidelines for safeguarding, can be included in dialogue on contributions by employees and managers to implement the Code of Conduct at annual performance and development interviews (MUS), team performance and development interviews with the assessment system (GRUS) and management performance and development interviews (LUS). Safeguarding is included in CISU's workplace assessments (APVs).

In connection with long-term travel for CISU, a standard sentence on Safeguarding is included in the Terms of Reference for the journey.

#### **3.3.3 Board**

Guidelines on safeguarding are included in "Bestyrelsens *ledelse af CISU*" (the Board's management of CISU). The Board is obligated to ensure compliance with CISU's guidelines on safeguarding. Among other things, the Board checks this at the annual Code of Conduct discussions.

For incidents concerning safeguarding, the Board must be notified by the secretariat management as soon as possible, with due regard for the persons involved.

### **3.3.4 Other stakeholders**

CISU prevents sexual exploitation and abuse of power by informing people of their rights and obligations. We do this through our capacity building, communication, contracts and cooperation agreements, etc.

CISU recognises that some population groups are more vulnerable than others. These include children and women who live in fragile or humanitarian situations in which human rights are particularly under pressure. CISU has particular focus on the rights of these groups and has therefore incorporated the international core humanitarian standards in implementation of the Danish Emergency Relief Fund (DERF).

CISU actively communicates our guidelines on safeguarding against sexual exploitation and abuse of power, and ensures that all member organisations, grant holders and partners are aware that we maintain a zero-tolerance policy towards sexual harassment, exploitation and abuse. Safeguarding is included in all CISU contracts, and violation of our guidelines for safeguarding can result in immediate termination of the contract.

CISU encourages everyone we work with to develop and implement approaches to, and systems for, safeguarding. Members and grant holders are encouraged to obtain child protection certificates for Danish adults, where a permanent relationship is established between the adult and children and young persons, either in Denmark or in the country where the partner organisation works. This may be by sending out volunteers and project workers or through repeated visits. Contact the police for rules on obtaining child protection certificates.

As part of our capacity-building services, we also offer our member organisations courses or organisation development processes to establish safeguarding procedures.

## **3.4 Reports on sexual exploitation and abuse of power**

CISU takes all reports on sexual exploitation and abuse of power seriously and investigates them thoroughly. See complaints system for reports (section 8).

### **3.4.1 At CISU**

As part of the CISU working culture, we consider it the duty of the individual to react on matters that violate our ethical principles. So, if anyone at CISU experiences or observes conditions within the workplace that clearly violate our ethical principles on safeguarding, they must report this. Sexual exploitation and abuse of power at CISU can always be reported to any member of CISU's management, an employee representative or a health and safety representative. Reports can also be made through a trusted colleague of the relevant person or via CISU's complaints system. If so requested, complaints can be filed anonymously, see section 8.

### **3.4.2 Externally**

Sexual harassment, exploitation or abuse can be reported by an identified sender or anonymously, and confidentially, see CISU's complaints mechanism, and by anyone who may have observed anything in

connection with CISU's work and/or with the work carried out by member organisations, grant holders and partners. Persons who have been exposed to sexual exploitation and/or abuse of power can report the matter themselves or through a person they trust.

### **3.5 Follow-up**

#### **3.5.1 Internally**

In the event of sexual violence or abuse of power at CISU, the parties involved will be offered qualified emergency counselling as quickly as possible. It is possible to receive advice, psychological counselling or similar paid by CISU if the incidents have caused a need for this.

CISU is committed to improving how safeguarding is dealt with on the basis of any cases arising.

#### **3.5.2 Communication**

CISU communicates at a general level about complaints received that have led to case processing and a decision.

CISU balances the various legal and ethical considerations in its communication, for example taking into account personal data processing regulations.

## 4 LEGAL PRINCIPLES AND GUIDELINES

Below is a summary of the legal principles forming the basis for CISU's work. They have been assessed by the law firm Bird & Bird, who found the text to be true and fair.

### 4.1 Legal basis

CISU is a private organisation and is not covered by the Public Administration Act and the Access to Public Administration Files Act. We manage considerable public funds through funding schemes from the Ministry of Foreign Affairs of Denmark, which enjoys a quasi-monopoly position over government subsidies for Danish civil society development interventions below DKK 15 million (EUR 2 million). Therefore, the outside world can expect us to follow the principles of sound administration practice applying to public authorities in the Access to Public Administration Files Act and the Public Administration Act.

CISU's Board has therefore decided that we must organise operations as if we were covered by the Access to Public Administration Files Act and the Public Administration Act, and that we follow the principles for sound administration practice.

Like other organisations, CISU is covered by the General Data Protection Regulation and by the Data Protection Act.

In the interest of our legitimacy, we want to be as open as possible when receiving requests for access to documents, insofar as our obligation to maintain secrecy or personal data protection regulations permit.

### 4.2 Key legal principles

The Danish Public Administration Act and the Access to Public Administration Files Act stipulate a number of legal principles that CISU has decided to follow. The most important principles are described below. In addition, we have included relevant principles from the General Data Protection Regulation.

#### 4.2.1 The doctrine of inquisitorial procedure

*(Not based on a specific Act but on an unwritten legal custom)*

We are subject to the so-called doctrine of inquisitorial procedure. This means that we are responsible for obtaining the necessary information in order to make the most appropriate decision. We ourselves decide when we consider the available decision-making basis adequate. In our day-to-day work, the doctrine of inquisitorial procedure means that we cannot reject an application on the grounds of lack of specific information, e.g. basic data on a partner. Instead, we must ask for this information in order to decide the case. This information must be submitted to us within a reasonable deadline, if not, we can reject the application. Applications that are obviously incomplete or have not been properly prepared according to the guidelines for the relevant intervention may be rejected, as the ability to design, describe and thoroughly prepare a project is part of the evidence that the applicant can perform the task and manage the funding properly. The same applies to applications that clearly fall outside the guidelines for the relevant intervention.

#### 4.2.2 Principle of impartiality

*(Chapter 2 of the Public Administration Act)*

We must be impartial in our processing of applications to the funding schemes. No person disqualified relative to any specific case must be allowed to decide, to take part in deciding, or otherwise to assist in the consideration of the case in question. Any person is disqualified if they or their closest relatives have a personal or financial interest in an application or in the outcome of such application.

### **4.2.3 No rigid formula**

*(Not based on a specific Act but on a series of judgments etc.)*

The guidelines for the funding schemes contain many rules that should be interpreted on the basis of a specific assessment. Written or unwritten internal rules and practices will arise in the specialist coordination and in the specific assessment practice. These rules help ensure smooth case processing and uniform consideration of applicants. However, the internal rules may never be so rigid that the assessment disappears, i.e. the assessment becomes restricted by applying a rigid formula. Applications should always be assessed individually according to the guidelines for the funding schemes. The internal rules are only guidelines; there should be space for atypical decisions and outcomes.

### **4.2.4 Principle of proportionality**

*(Not based on a specific Act but on an unwritten legal custom)*

This principle means that we can only impose on applicants something that is in proportion to the case. For example, our requirements for the application's level of detail, documentation, etc. should be in proportion with the amount applied for. The principle does not apply the other way around: that our administrative burden should be in proportion to the case. We may, however, reject applications by referring to our resources, e.g. when processing obviously incomplete applications.

### **4.2.5 Requirement for hearing the parties**

*(Chapter 5 of the Public Administration Act)*

If we receive new information about an application – e.g. a response from an embassy – which is *"unfavourable to the party concerned and essential to reaching a decision in the case"*, the applicant is entitled to be notified of such new information and to comment on the information before we make a decision. When hearing parties, we send the relevant information to the applicant, who must respond in writing within a reasonable time.

### **4.2.6 Duty to make notes**

*(Section 13 of the Access to Public Administration Files Act)*

When processing funding applications, we are obligated to prepare written notes if we orally (by telephone, at meetings, etc.) receive information regarding the actual circumstances of a case that is important to reaching a decision in the case. However, this does not apply if the information is already stated in the case documents. The written notes must be included in the case and are covered by the right of access to documents.

### **4.2.7 Registration**

*(Section 15 of the Access to Public Administration Files Act)*

When processing funding applications, we are obligated to register all documents that are important to reaching a decision in the case. The documents are registered with date of receipt and sending and are covered by the right of access to documents.

### **4.2.8 Duty to advise**

*(Section 7 of the Public Administration Act)*

We are obligated to advise and assist organisations applying for funds from the funding schemes. For example, the duty to advise means that we must provide information about what application form to use, deadlines, guidelines, etc. The duty to advise includes no obligation to advise applicants on how to organise their project or word their application, but this can be part of our services for member organisations.

### **4.2.9 Requirement for grounds for rejection**

*(Chapter 6 of the Public Administration Act)*

The grounds for full or partial rejection of an application or an approval with conditions or reservations must be given in writing. If we approve the application without conditions or reservations, there are no requirements for grounds. The grounds must refer to the rules (typically specific rules in the guidelines for the funding schemes) on which the decision is based. If the decision is based on an estimate, we must state the main considerations taken into account when reaching the decision.

### **4.2.10 Obligation to maintain secrecy**

*(Chapter 8 of the Public Administration Act and section 152 of the Criminal Code)*

We have an obligation to maintain secrecy in relation to the interests of private individuals or private companies or organisations in protecting information about personal or internal, including financial, matters. This includes information that may be detrimental e.g. to a partner organisation in the countries of intervention if publicly disclosed. The obligation to maintain secrecy also applies to public authorities such as the Minister for Foreign Affairs. As a private organisation, we are not covered by section 28 of the Public Administration Act on the provision of information to other public authorities. CISU will generally not disclose personal data to public authorities, unless this is required by legislation.

### **4.2.11 Right of access to documents**

The general public and persons who are parties in a case generally have a right of access to documents and registers kept by us:

- **Access to documents according to the Access to Public Administration Files Act** *(Chapter 2 of the Access to Public Administration Files Act)*: Anyone is entitled to seek access to documents in a case etc. according to the Access to Public Administration Files Act. This applies regardless of whether they are parties to, or otherwise involved in, the case. The right of access to documents generally covers all documents sent to us or created by us as part of our case processing. However, there are three important exemptions: a) our internal working papers b) information about private, including financial, matters and c) information we do not have authority to disclose according to data protection law. Our internal working papers are, however, subject to the right of access to documents, if they include factual information that is significant for the case and that does not

appear in other documents in the case, or if they have been disclosed to third parties and therefore are no longer internal.

**Extended openness** (*section 14 of the Access to Public Administration Files Act and section 10 of the Public Administration Act*): We have imposed upon ourselves an obligation to consider extended openness. This means that we must consider whether we can provide access to the requested documents, even if the person requesting access does not have the right to access such documents. We should always consider whether there is anything preventing us from disclosing documents. If we deem that there are no obstacles to disclosing documents in relation to the principle of extended openness, the documents/information should be disclosed.

- **Access to documents according to the Public Administration Act** (*Chapter 4 of the Public Administration Act*): This right only applies to parties to a case in which a decision has been or will be made by an administrative authority. A party to such a case is entitled to access to all documents in the case. This also applies to our internal working papers and documents if they include information or assessments that are significant for the case and that do not appear elsewhere in the case, or if the documents have been prepared to comply with the duty to make notes.

As we are not a public authority and only follow the administrative law principles by choice and not because we are subject to the regulations, we may have to deny access to personal data to the extent that such disclosure of personal data is not authorised by the General Data Protection Regulation.

### 4.3 Principles relating to processing of personal data

*(Article 5 of the General Data Protection Regulation)*

CISU is obligated by the General Data Protection Regulation which, among other things, stipulates a number of principles applying to all processing of information on natural persons:

- We only collect and process personal data where this is lawful and fair, and always with the utmost transparency for the person whose data we process. We are open about the processing of personal data we carry out.
- We only collect and process personal data for explicit and legitimate purposes. If we do not have a relevant purpose for specific personal data, we do not collect it, or we delete it.
- Data collected will not be subsequently processed for purposes that are incompatible with the purpose for which it was collected.
- We only collect and process personal data that is necessary and relevant for the purposes for which we collect personal data. We strive to minimize the amount of the personal data we collect to what is adequate for the purpose.
- We make efforts to ensure that the personal data we collect is accurate and kept up to date. If we detect inaccurate personal data, this will be rectified or erased.
- We do not keep personal data for longer than is necessary. When the purpose has been fulfilled and we no longer have an objective reason to continue to keep personal data, we will delete it in a secure manner.

- We will process personal data in a secure manner and protect personal data from being disclosed to unauthorized persons – also internally – and against accidental loss, destruction or damage.

### **4.3.1 Processing of ordinary personal data**

*(Article 6 of the General Data Protection Regulation)*

We only collect and process personal data when we are authorised for the specific processing in accordance with data protection law. In relation to the personal data that we mainly collect and process in our organisation, our authority will usually be that:

- consent has been given in the form of a freely given, specific, informed and unambiguous indication of the person's agreement to the processing of personal data,
- processing is necessary for entering into or for the performance of a contract to which the person is party, or for the processing of an application submitted by the person,
- processing is necessary for compliance with a legal obligation to which we are subject.
- processing is necessary for the purpose of the legitimate interests pursued by us, except where such interests are overridden by the interests of the person.

### **4.3.2 Processing of special categories of personal data**

*(Article 9 of the General Data Protection Regulation)*

For certain special categories of data, it is more difficult to find relevant authority. Such special categories are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Generally, we will not collect this type of data.

However, in some cases, we may have an objective and relevant purpose to collect such data. In these situations, we will only collect and process such data if:

- consent has been given in the form of a freely given, specific, informed and explicit indication of the person's agreement to the processing of personal data,
- processing is necessary in order for us to carry out our obligations in the field of employment and social security and social protection law insofar as it is authorized by law or a collective agreement,
- processing is necessary for the establishment, exercise or defense of legal claims.

We only collect and process a person's civil registration number (CPR no.):

- when legislation states that we must or may process CPR nos., when the conditions for processing special categories of personal data have been met, or when the person in question has given consent.

### **4.3.3 Rights of the persons whose data we process**

*(Articles 12-23 of the General Data Protection Regulation)*

The persons whose data we process have a number of rights according to data protection law. These include the right:

- to receive information about our collection and processing of personal data,
- to request access to the personal data we process about the person in question,

- to have incorrect personal data rectified by us,
- in certain situations, to have all or some personal data erased by us,
- under certain circumstances, to restrict the processing to storage,
- to receive certain personal data which the person has provided to us in a structured, commonly used, machine-readable format, and to transmit this data to another controller.
- to object to our processing of personal data, including an unconditional right to object to the processing of personal data for the purpose of direct marketing,
- to revoke a consent given, and
- to file a complaint with the Danish Data Protection Agency about our processing of their personal data.

We will assist and facilitate the exercise of people's rights, and we will respond to enquiries without undue delay and by no later than one month after receipt of an inquiry.

#### **4.4 Working procedure consequences**

##### **4.4.1 General information on access to documents**

In the interests of our legitimacy, we want to be as open as possible when receiving requests for access to documents. However, whenever we decide on access to documents, we must also comply with the regulations in the General Data Protection Regulation. Consequently, we may not be able to disclose personal data which could otherwise have been disclosed pursuant to the regulations on access to documents.

- Pursuant to the regulations of the Danish Public Administration Act on the right to access documents for the parties to a case, we must disclose all documents including relevant internal documents, memos, e-mails, etc. of the case to which the person or organisation is a party. As a general rule, content from the database, draft minutes of internal meetings, memos from advisory services, etc. must only be disclosed if they include significant information or assessments with implications for the case, and if such information and assessments are only available in such documents.
- Requests to access documents under the Access to Public Administration Files Act will often be restricted to documents related to case processing and management of applications to the funding schemes, rather than information relating to advisory services and courses. The consideration for openness should be balanced against our duty to protect the financial interests of the applicant organisation in accordance with the regulations on the obligation to maintain secrecy. Applications to the funding schemes, as well as any annexes to the applications, are covered by requests for access to documents, but we must ensure that any personal data is excluded in accordance with the Access to Public Administration Files Act. In practice, we exclude information by blacking it out before answering a request for access to documents and disclosing the documents concerned.

The principle of extended openness means that, in connection with processing an application for access to documents, we must consider whether access may be granted to more documents and

information than we are obligated to disclose. Therefore, we should always consider whether there is anything preventing us from disclosing documents that could be excluded from access. If there are no obstacles to disclosing documents etc., such documents/information should be disclosed in line with the principle of extended openness.

- Access to documents must be granted as quickly as possible, and within seven working days, unless, in exceptional circumstances, this is not possible due to the scope or complexity of the case.

When specific access to documents has been granted, CISU will inform the parties involved.

#### **4.4.2 Specifically, regarding access to operations and administration documents**

Our management accounts, expenditure vouchers, etc. are covered by the right of access to documents pursuant to the Access to Public Administration Files Act.

#### **4.4.3 Specifically, regarding access to assessment process documents**

All communication between the assessment consultants and the assessment committee and its members is covered by the right of access to documents, either pursuant to the Danish Public Administration Act or the Access to Public Administration Files Act. Similarly, communication between assessment consultants and other employees at the secretariat as part of case processing is covered by the right of access to documents. This also applies to emails, memos, etc. prepared on the basis of oral communication. However, communications between the assessment committee members themselves and between the assessment consultants themselves are internal documents not covered by the right of access to documents.

#### **4.4.4 Obligation to maintain secrecy**

Applications to the funding schemes, as well as any annexes to the applications, are covered by CISU's obligation to maintain secrecy, to the extent that such applications contain personal or sensitive data about the applicants or their partner organisation. The same applies to information and matters that have emerged in connection with courses and advisory services, unless such information is part of the actual processing of an application to the funding schemes or of a grant. Applications etc. may be published following prior written approval from the relevant organisation, unless we are under an obligation to disclose the applications following a request for access to documents.

#### **4.4.5 Secrecy in relation to the Ministry of Foreign Affairs of Denmark**

CISU's employees have an obligation to maintain secrecy in relation to the Ministry of Foreign Affairs of Denmark and other public authorities. The obligation to maintain secrecy should be interpreted such that we will not disclose any kind of information about member organisations or funding scheme applicants if this could be detrimental to their future relationship with the authority in question, unless such disclosure is part of the agreed and established procedures in connection with processing the cases. As a general rule, information and documents covered by the right of access to documents pursuant to the Access to Public Administration Files Act may always be disclosed to relevant authorities.

### **4.4.6 Duty to record the assessment process**

Verbal information received by the assessment consultants during the assessment process is covered by the duty to make notes. The same applies to verbal information from meetings of the assessment committee that may affect the outcome of the case. Discussions of the assessment committee are not covered by the duty to make notes.

### **4.4.7 The doctrine of inquisitorial procedure**

The assessment consultants have a right and a duty to collect any information not included in the application in order to make a decision that is as correct as possible. This information can be obtained from the applicant or, if the missing information is factual information, from the other employees at the secretariat. For example, the latter could concern information on whether an applicant has received advisory services, but not on the specific content in the advice given.

### **4.4.8 Processing of personal data**

We process personal data in accordance with the General Data Protection Regulation and the Data Protection Act, and the principles contained therein. Read more about CISU's processing of your personal data in CISU's external personal data policy.

## 5 ANTI-CORRUPTION AND IRREGULARITIES

### 5.1 Target group

CISU's anti-corruption policy describes our principles for preventing and managing corruption, fraud and abuse. The policy applies to CISU and all types of grant holders under CISU's funding schemes. To a certain extent, it also applies to other stakeholders. How the policy applies to the individual groups is described in the section below.

### 5.2 Objective: to avoid corruption, fraud and abuse altogether

CISU does not accept corruption, fraud or abuse of any kind, not in the organisation itself, among our partners, in our member organisations nor in organisations with grants from CISU's funding schemes. CISU works constantly to prevent corruption and is consistently monitoring and following up on corruption, fraud and abuse in CISU, in the Danish organisations, their partner organisations and in connection with grants.

CISU acknowledges that Danish civil society organisation activities often take place in countries where corruption can be widespread due to social and economic conditions. CISU expects our member organisations, grant holders and their partners to do their utmost to avoid and prevent corruption, fraud and abuse, but at the same time, we acknowledge that they may, involuntarily, be affected by the problem.

CISU is of the opinion that prevention is the most important area of intervention. The objective is to reduce or eliminate any irregularities, including corruption, fraud and abuse. If irregularities do occur, we will strive to reduce their consequences and ensure adequate and efficient follow-up, proportionate to the scope of the case.

Prevention of corruption, fraud and abuse is closely linked to developing legitimate organisations, characterised by transparency and democratic control, in the countries of intervention. The organisations should establish structures to ensure that management and employees are held accountable, for example by their own board of directors, their members and their target group.

### 5.3 Definitions

- CISU's basic understanding of corruption is "the misuse of entrusted power and resources for private gain". "Private gain" includes family members and friends, personal and work-related networks, and platforms strengthening the power of the person(s) involved.
- Misuse of resources can take many forms: fraud in connection with audits, deliverables not covered by an agreement, incorrect prices or faulty equipment, incorrect invoicing of staff or equipment, bribery or acceptance of gifts, misuse of resources, fraud in connection with business trips or official journeys, theft, etc.
- Similarly, abuse of entrusted power can take many different forms: psychological, physical or sexual harassment, discrimination, unauthorized access to privileges or arbitrary/unauthorized grants of privileges, abuse of power and relationships in recruitment processes, etc.

### **5.3.1 Scope**

This part of the Code of Conduct primarily focuses on misuse of resources. The other sections include a number of themes relating to anti-corruption and abuse of power.

### **5.3.1 Corruption in practice**

Since there is no generally valid definition of corrupt behaviour, partly inspired by the (non-exhaustive) list of definitions proposed by the Ministry of Foreign Affairs of Denmark, we have established that corrupt and dishonest practice includes the following actions:

#### ***5.3.1.2 Fraud***

Fraudulent and deceitful behaviour refers to deliberate actions committed by a person for private gain. This includes misrepresentations, extortion, conspiracy, collusion, fraud, nepotism and favouritism, theft, embezzlement, forgery and deceptive or fraudulent reporting of costs in relation to project activities, travel expenses, daily allowances, etc.

#### ***5.3.1.3 Bribery etc.***

The act of offering payment exceeding usual rates in return for special favours or to speed up case processing is corrupt behaviour and practice (bribery).

#### ***5.3.1.4 Misuse of resources***

Misuse of resources is the use of money and assets (e.g. procurement of equipment not intended for the project, failure to ensure secure storage of assets, private use of equipment, etc.) for purposes other than those mentioned in the application for funding for projects and activities, as well as negligent or inappropriate maintenance of assets.

#### ***5.3.1.5 Serious irregularities***

This refers to inadequate accounting, delayed or no financial reporting to partners and donors, waste in managing physical, financial and human resources, as well as other types of neglect caused by poor project management, etc.

#### ***5.3.1.6 Accepting and offering large gifts***

This refers to accepting and offering of gifts or favours that are not symbolic in nature, i.e. gifts other than pens, calendars, etc. Bringing and/or receiving minor gifts, such as cookies, scarves, etc. when visiting the partner country is acceptable, as this is a social convention. No person may, directly or indirectly, request or receive any kind of gift, service or other item of value given in return for work-related actions or omissions or which affects - or seems to affect - the performance of his/her functions, duties or judgement. This also applies to assets transferred to third parties (spouses/partners, children, etc.).

#### ***5.3.1.7 Concealment***

Concealment includes disguising or failing to disclose contract management aspects or potential conflicts of interest in collaboration with partner organisations, service providers, suppliers and business partners. This

includes any attempts to conceal close family relationships, financial interests and other significant relationships.

### **5.4 CISU**

CISU must not contribute to corruption, bribery or fraud, see above, neither actively nor passively.

Irrespective of the local customary practice, CISU will not compromise on our integrity. At CISU, we will not give, pass on, ask for or receive any gift or other favour, neither in Denmark nor abroad, if the gift or favour has more than symbolic value and if it can influence our impartiality or judgment.

### **5.5 Member organisations**

We actively try to prevent our member organisations and their partners from contributing to corruption and bribery, whether actively or passively, and irrespective of the local conditions. This applies even if bribery etc. is a common feature of the local community and local customary practice.

We work actively to communicate opinions, knowledge and methods to prevent corruption, fraud and abuse with a view to motivating and developing the capacity of our member organisations and their partners to take real action. We do this through our advisory services and courses, and by communicating knowledge, methods and tools on preventing and combating corruption and fraud, for example on our website.

Furthermore, by offering advice and consultancy to our member organisations, we help settle suspicion. Furthermore, we help our member organisations and grant holders take swift and appropriate action after detecting corruption, fraud and abuse. For example, we offer advice, consultancy, help to report the matter and to cooperate with the Ministry of Foreign Affairs of Denmark, including any assistance with legal clarification.

We consider it good practice and an organisational strength if an organisation which inadvertently and unintentionally becomes involved in bribery or corruption is open about its experience and takes immediate steps to follow up on the matter.

### **5.6 Grant holders from CISU's funding schemes**

With respect to all grants from CISU's funding schemes, the Danish grant holder and the partner(s) undertake to manage the grant in accordance with the guidelines for the funding schemes and the provisions of the Ministry of Foreign Affairs of Denmark. This includes a duty to prevent and eliminate corruption, fraud and abuse.

All CISU grant holders guarantee with their signatures that they will comply with the anti-corruption provisions of the Ministry of Foreign Affairs of Denmark and/or the EU.

According to the guidelines for CISU's funding schemes, the Danish organisation is responsible for reporting to CISU immediately if there is a reasonable suspicion of theft, fraud, corruption, abuse or other irregularities, or if such matters have been ascertained.

CISU is obligated to take action if we receive information indicating fraud, misuse of resources or other forms of corruption or irregularities. We are loyal in our cooperation with the organisations, and our grant

holders and member organisations can safely seek advice and guidance from us when they have a suspicion or when they have ascertained an irregularity etc.

CISU has adopted detailed procedures for managing suspected and ascertained irregularities in connection with grants from CISU's funding schemes. The procedures are available on [www.cisu.dk](http://www.cisu.dk) and, among other things, they describe how suspicions and documented cases of abuse should be investigated and reported, and how to follow up and report the matter to the Ministry of Foreign Affairs of Denmark.

The procedures also describe how to complete a case following adequate investigation and clarification, and after imposing sufficient and efficient consequences which are proportionate to the scope of the case. Suspicions and ascertained cases will be published on CISU's website on an ongoing basis, following reporting to the Ministry of Foreign Affairs of Denmark.

## 6 SECURITY

### 6.1 General security

#### 6.1.1 Legal security

CISU follows a specific set of legal principles for its activities, see the section on legal principles.

For all agreements, CISU concludes contracts with employees as well as external consultants, suppliers, lessors, etc. These contracts must be stored securely pursuant to the personal data protection regulations and other relevant legislation, including the Danish Financial Statements Act and the Bookkeeping Act.

CISU has entered into a contract with (currently) Willis Towers Watson on insurance coverage for all CISU's activities. Our insurance package covers the following: Industrial injuries (accident insurance, liability insurance, etc.), business insurance (chattels etc.), business travel insurance, board liability insurance, professional liability insurance (advisory services etc.). Regular meetings are held with Willis concerning insurance coverage, new offers, etc. A dedicated contact person (Key Account Manager) has been assigned to us and we have a 24/7 telephone service, etc.

#### 6.1.2 Financial security

CISU has bank accounts in different banks: (Bookkeepers, controllers, named back-up employees and the secretariat management have restricted powers of attorney ("*B-fuldmagt*") to manage all CISU accounts. This means that no one can manage the accounts and CISU's liquidity alone. In order to prevent hacking and tracking, no employee or manager with access to the online banking system has a wireless keyboard. Every month, a bookkeeper prepares a bank reconciliation which is checked and approved by a controller. All bank accounts are part of the unannounced audit visit and the annual external audit. Every three or four years, CISU's audit assignment is put out to tender to ensure that audit services are provided at a fair and reasonable price and prevent CISU from remaining in a contractual relationship with the same auditors for several years. If audit services are provided by a large audit firm, i.e. a firm with a large group of employees and partners, the same firm may provide audit services for a longer period of time, as long as the individuals, employees and/or the signing partners are replaced regularly. CISU only has a very small cash balance, which is regularly reconciled by the two bookkeepers: one is in charge of day-to-day administration of expenses etc., and the other is in charge of controlling and reconciling.

#### 6.1.3 Cooperation on employee safety

The CISU secretariat has established safety cooperation between the management and the employees with an elected health representative. Workplace assessments (APVs) are carried out regularly in accordance with relevant rules. Safety issues and initiatives are discussed as required, always after a workplace assessment and twice a year at cooperation committee meetings at which the management, the health and safety representative and a trade union representative participate.

The employee-elected health representative is responsible for the workplace assessment together with the management. The health representative is at the disposal of employees and the management in the event of cases concerning physical and psychological health and safety. This is reflected in the design of the

secretariat, procurement policies, supervision and guidelines in the employee handbook, as well as other policies and business practices.

The secretariat management strives to be available 24/7, so that it can be contacted in the event of safety and security incidents.

### **6.1.4 Physical security**

Physical security at the office in Aarhus is supported by a common subscription with Falck (a private emergency and alarm service) for the shared office facilities in “Uhuset”, including fires extinguishers etc. and a shared alarm system. All regulations for the required number of square meters per employee, ventilation etc. are observed and are included in the workplace assessment. All employees have sit/stand desks, office chairs and relevant work equipment, and special needs are addressed following an application and budget follow-up.

### **6.1.5 Communication security**

CISU has an internal IT team and an agreement with an external IT support company, responsible for all tasks related to CISU’s IT systems, including telephone systems, computers, networks, servers, etc. All computers/workstations are password-protected, external access (via VPN and remote desktop) to CISU’s servers/networks is subject to additional security, anti-virus software has been installed, and regular backup is taken. When travelling to countries in which data may pose a security risk, it is possible to borrow “empty” laptops, i.e. laptops without emails and documents, a mobile phone for a local SIM card, etc.

## **6.2 Security when travelling abroad**

CISU has thoroughly described the security procedures and emergency planning for business trips or official journeys abroad made by employees, board members and employees in the assessment system. In other words, journeys for which CISU has an insurance obligation. Contracted external consultants/companies are generally responsible for their own safety and insurance, but they can find guidance in CISU’s guidelines. The guidelines can be submitted on request.

## **7 COMPLAINTS AND REPORTING SYSTEMS**

### **7.1 Areas covered**

#### **7.1.1 Complaints and reporting of unacceptable circumstances**

Complaints and reports can be submitted about unacceptable circumstances in all of CISU's working areas, including areas covered by this Code of Conduct.

However, actual decisions on grants taken by CISU's assessment systems cannot be made subject to a complaint, because such decisions are based on administrative estimates, and do not comply with specific rights.

Complaints and reports can be submitted about the way in which CISU's grant holders implement and administrate interventions supported by CISU, both in Denmark and abroad, and about employees involved in carrying out these interventions. However, in the first instance, reports and complaints should be submitted to and processed by those who are immediately responsible (see below).

#### **7.1.2 Complaints procedure and principles**

CISU promotes a culture of openness with easy access to file a complaint, transparent procedures for dealing with complaints, and clearly stated reasons for decisions.

No complaints will be subject to reprisals or other discriminatory action by CISU. However, CISU may impose various consequences against persons, companies or organisations who are proven to have made false accusations. For example, CISU may impose disciplinary measures against its own employees (warning/dismissal/exclusion), terminate contracts with grant holders and suppliers, file a police report in criminal matters or claim compensation for damage suffered.

#### **7.1.3 Irregularities reported by grant holders**

Grant holders and their partners are obligated to report all significant irregularities in the implementation of their CISU-funded interventions, see the text in grant contracts and the CISU administration guide.

#### **7.1.4 Complaints or reports of unacceptable circumstances in interventions supported by CISU's funding**

Complaints about circumstances within interventions supported by CISU must be filed and dealt with as close to the activity as possible. For instance, complaints from the target group should generally be submitted to the local partner. In the event that the partner is the reason for the complaint, the complaint should be submitted to the next stage in the chain, usually the Danish organisation/grant holder at CISU. The chain may have several stages.

CISU therefore receives and deals with all complaints and reports regarding the Danish organisation/grant holder but may in some cases choose to deal with complaints or reports from both the target group, local partners and other stakeholders and intermediaries involved. This will apply in particular for complaints from the target group about the implementation of relief interventions, see point 5 of the CHS (Core Humanitarian Standard).

### **7.1.5 Complaints about case processing in grant decisions**

As a general rule, complaints cannot change decisions made in the assessment system. However, a new assessment can be undertaken if substantial and formal errors in the case processing can be proven. Therefore, assessments and estimates made in the assessment system cannot be changed.

Any complaints about the processing of an application are dealt with according to section 8. A representative from the relevant assessment system takes part in the investigation of the case.

In any event, all complaints about grant decisions will be passed on in the system and used constructively in ongoing assessments of specialist practice conducted at CISU between the Board, assessment consultants, the assessment committee and the secretariat.

### **7.1.6 Whistle-blower scheme**

Complaints and reporting procedures include a whistle-blower scheme: CISU uses the following definition of whistleblowing (from Transparency International): "The disclosure of information about a perceived wrongdoing in an organisation, or the risk thereof, to individuals or entities believed to be able to effect action".

CISU acknowledges that people reporting irregularities or suspicion of abuse or corruption may be under great pressure. Providing information about unacceptable circumstances should be a safe alternative to not providing information. CISU will ensure that whistle-blowers can inform CISU as easily as possible and, as far as possible, CISU will protect whistle-blowers against reprisals from the organisation or persons they report about, for example their own employer or others they otherwise depend on.

CISU will therefore protect the identity of a whistle-blower and make every effort to prevent retaliation. There will be no sanctions against wrong information, if the report proves incorrect. However, CISU may impose various consequences against persons who are proven to have made false accusations. For example, CISU may impose disciplinary measures against its own employees (warning/dismissal/exclusion), terminate contracts with grant holders and suppliers, file a police report in criminal matters or claim compensation for damage suffered.

It is also possible to report unacceptable circumstances anonymously both internally at CISU and externally, through the form on our website or anonymous reports can be made by telephone.

## **7.2 Filing and processing complaints**

### **7.2.1 Filing a complaint or reporting unacceptable circumstances**

Complaints, reports or whistleblowing are usually sent to the same email address, regardless of their nature, through the form on the website. A specific complaints instruction with the required minimum information and a format to support the process will be made readily accessible on CISU's website. This will be in Danish and English.

Internally at CISU, complaints/reports can also be filed by contacting CISU's secretariat management, the chairperson of the Board or the employee representative directly. Reporting can also be done through a trusted colleague of the relevant person.

Any person can receive complaints instructions from CISU's secretariat management by telephone or personal contact.

### 7.2.2 Dealing with complaints

All complaints procedures result in the opening of a case that will be dealt with by CISU. Cases are normally dealt with by the secretariat management and by a Board representative appointed by the Board (complaints group). For complaints concerning any of these persons, another management or Board representative will be appointed for the case.

The group ensures registration of the case. Initially, the group assesses whether the case requires no further action and can be rejected. In such case, the rejection will be reasoned in brief. The Board must be informed about rejected cases.

The group will then:

- examine and investigate the facts of the case as well as provide the best possible decision-making basis for the inquiries and complaints received in respect of all parties involved.
- ensure that a police report is or has been filed, if the complaint is deemed to be sufficiently serious to fall under the Danish Criminal Code.
- prepare an informative note as a basis for deciding the case when the group considers it sufficiently clarified, and a recommendation of the possible outcome and sanctions.

The secretariat management will assess the case and decide the sanctions to be imposed, see section 1.6. Complaints regarding sanctions or sanctions against the secretariat management will be dealt with and decided by the Board.

If necessary, the secretariat management may decide to temporarily suspend the involved CISU employee(s) etc. while the case is being investigated. Similarly, the group may temporarily suspend cooperation with external partners, grant holders (including stop payments) and suppliers, while the case is being investigated.

The group will then:

- monitor the process of the case, and ensure the necessary follow-up after a decision has been made
- prepare a final report containing the outcome of the case
- ensure documentation of reports and complaints and anonymized statistics of all complaints
- ensure correct storage of cases according to personal data protection law and sufficient anonymization of data for statistics and communication and ensure that all material in email correspondence with Board members and similar is erased at the relevant parties.

The resources applied for processing the report/complaint should be adapted to the nature and severity of the case.

Exemptions in case processing:

## Code of Conduct

- If the report concerns irregularities/corruption reported by an organisation itself, the case will be transferred directly to processing according to CISU's administration guide and any guidelines from the Ministry of Foreign Affairs of Denmark/Rigsrevisionen - the Danish national audit office/the European Union and guidelines from any other donors.
- For complaints about processing in grant decisions, a representative of the relevant assessment system appointed by the management will be involved in investigation and assessment of the case. The group will decide the case according to section 7.1.4.

### Involvement of other parties in case processing:

- An employee representative (or a substitute) will always be involved as a dialogue partner in connection with reports/complaints concerning secretariat employees.
- When investigating the case, the complaints group may request anyone at CISU to help provide information.
- In special cases, the group may contract with an external expert or similar to ensure the best possible decision-making basis.