

CODE OF CONDUCT

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This is a translation of the Danish original. In case of doubt or discrepancy, the Danish version shall prevail.

1. Introduction

1.1 Background

This Code of Conduct brings together the most important principles, guidelines and contingency plans that we at CISU apply in our daily work.

The code is based on our shared values and many years of experience with responsible and transparent management and capacity development. Transparency and integrity are the fundamental principles for everything we do. The document helps ensure that we can perform our tasks well and reach the goals we have set for ourselves.

We have aimed to write in a language that is easy to understand. At the same time, the code also serves as an administrative and legal basis for our work. For that reason, some sections are necessarily more technical and detailed.

Everyone in and around CISU is welcome to suggest how we can make the code, and its use in practice, even better.

1.2 A dynamic document

This code is a living document that may be adjusted on an ongoing basis. Changes may arise if new knowledge, new rules, changed needs or changes in our context occur.

Each year, we review the document and assess whether changes are needed. Substantial changes must be approved by the Board. The annual review also covers CISU's complaints and whistleblowing mechanisms. As part of the annual monitoring, the Board is informed of cases falling under the code.

In drafting the most central parts, legal advice has been obtained, and we continuously assess whether further legal input is required.

1.3 Target groups and terminology

The primary target group for the document is CISU's own organisation: the Board, Secretariat staff (including management), external consultants during contract periods, grant consultants, and

members of grant assessment committees and steering committees. When we write 'CISU' in this document, we refer to this group. Individuals covered by the Code of Conduct confirm through their contracts and agreements that they know its content and will comply with it.

The secondary target group comprises all other actors with a contractual relationship to CISU. This includes individuals, institutions, businesses and organisations that CISU cooperates with – for example those who:

- receive funds from CISU to carry out a task
- provide a service
- receive funds to carry out awareness-raising work, development projects and/or humanitarian efforts

The provisions of this Code of Conduct apply directly to these actors when set out in agreements, grant contracts or similar. This also applies where Danish legislation or other regulatory requirements (e.g. criminal law or liability rules) make it relevant.

Indirectly, "other actors" are also a target group, as they encounter CISU's principles through our materials, dialogue and capacity building. In this code, the term other actors is used for this entire group.

1.4 External communication

When we report to donors, CISU's Code of Conduct forms an important part of the documentation. Cases of corruption are published on the Ministry of Foreign Affairs' website in accordance with applicable rules and the GDPR

1.5 Prevention of breaches

CISU's management works actively to ensure that everyone covered by the code knows their responsibilities. We inform, train and guide key individuals so that they can act in accordance with the principles and support others in doing the same.



FOTO: KIRSTEN ADLER

1.6 Consequences of breaches

Breaches of the Code of Conduct can have consequences depending on the nature and seriousness of the case. Reactions may range from guidance and reprimands to termination of cooperation, reporting to the police, or claims for compensation.

If CISU establishes that individuals, companies or organisations have seriously breached the Code of Conduct, we may impose various forms of sanction, including:

- for employees and contracted staff: disciplinary measures such as a warning, dismissal or summary dismissal
- for member organisations: suspension of membership
- for individuals associated with grant holders or partners: exclusion from taking part in or representing organisations in relation to CISU-funded activities
- for grant holders and suppliers: termination of contractual relations – if necessary, with immediate effect
- in criminal matters: reporting to the police
- in cases of incurred loss: filing a claim for damages

1.7 CISU's foundation and values

CISU is a membership-based civil society organisation that works on the basis of statutes and strategies adopted by the General Assembly and the Board. Our work supports capacity development, grant management and international development and humanitarian work, with respect for human rights and the UN Sustainable Development Goals. As an organisation, CISU represents the interests of its member organisations in strengthening civil society participation.

1.8 Management of CISU

CISU's management is described at an overall level in the statutes. The Secretariat is led by the Secretariat management team. The Board holds strategic responsibility for CISU, as described in the organisation's Rules of Procedure.

1.9 Quality Assurance

CISU has systems, guidelines and procedures that ensure quality in our work. These are continuously adjusted by the Secretariat's working groups and group coordinators, and quality is followed up by CISU's management and the Board.

Grant management is based on transparent and professional processes, which are approved by donors and supported by this Code of Conduct.

CISU'S CORE VALUES (ADOPTED IN 2016)

These values are the foundation of our daily work. They form the framework for how we view the world and engage in relationships. Our credibility rests on our ability to clearly translate the values into practice.

- **Diversity:** We want to ensure a broad range of approaches within civil society work, because different approaches and types of actors are characteristic of a well-functioning civil society
- **Transparency:** We strive for transparency in all our actions and decisions
- **Accountability:** We take responsibility for our own actions and decisions and expect the same of others
- **Participation:** We give everyone equal opportunity to take part, because all people have something valuable to contribute
- **Respect:** We meet people where they are and support them in working towards their own goals. We allow ourselves to be challenged in our views and opinions and learn along the way
- **Collaboration:** We collaborate broadly, because it is an inspiring, necessary and constructive route to sustainable results
- **Voluntarism:** We create space for voluntary involvement in civil society, because people's free will and voluntarism are the driving force of committed civil society work

2. Ethical principles and guidelines

2.1 Fundamental Ethical Principles

CISU's Ethical Principles are built on CISU's values: diversity, transparency, accountability, participation, respect, collaboration and voluntarism. These values form the basis of our work and reflect a human rights-based approach, including the PANT principles (Participation, Accountability, Non-discrimination and Transparency). The following sections elaborate on selected values and show how they are translated into ethical principles in our work.

2.1.1 Transparency and confidentiality

CISU places emphasis on transparency and openness in cooperation with member organisations, donors, partners, the press and the public. Our starting point is that information should be shared as openly as possible. At the same time, we have a clear duty to protect confidential information, both concerning personal matters, privacy and sensitive information that we receive through, for example, advisory services, courses or other activities. The rules on transparency and confidentiality are set out in CISU's legal guidelines and supplemented by our policy on data protection and the handling of personal data.

2.1.2 Good cooperation and conduct

CISU wants to promote cooperation based on respect, recognition and a constructive tone. This applies in relations between colleagues, between management and staff, within the Board and committees, as well as in contact with members, partners, the press and other actors.

2.1.3 Non-discrimination

At CISU, we treat all people with respect. We do not accept any form of discrimination, either in our internal work or in our external relations. This means that we do not discriminate on the basis 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 do not accept that anyone uses their position within the organisation to advance their own interests or to exert pressure on other individuals, companies or organisations. Nor do we accept CISU's resources, premises or equipment being used for private purposes without permission. To prevent abuse and ensure equal treatment in all relationships, we have systems and procedures that protect against both discrimination and abuse of power. Here we also refer to our separate section on safeguarding.

2.1.5 Actual and potential conflicts of interest

At CISU, we work to avoid situations where personal interests may conflict with the interests of the organisation, or where there may be an impression that this is the case. Private interests can be any kind of advantage that benefits us, our family, friends, business connections or organisations that we are affiliated with.

2.2 Application of the Ethical Principles

2.2.1 In the organisation's daily work Impartiality:

Everyone at CISU is responsible for informing CISU's management, or the Board, of actual or possible conflicts of interest. This also means that one must declare oneself disqualified if there could be doubt about one's impartiality.

- For employees, members of grant assessment committees and consultants, any doubts are decided by CISU's management
- For CISU's management, doubts are decided by the chairpersons
- For the chairpersons, this is decided by the Board

GIFTS AND BENEFITS

We must neither directly nor indirectly give, receive or facilitate gifts or other benefits if they could affect our impartiality or the performance of our tasks. However, minor courtesies, such as meals or ordinary gifts in connection with birthdays and anniversaries, are acceptable.

If employees receive small gifts or tokens of appreciation in connection with their work (e.g. refreshments at a talk), these are regarded as belonging to the workplace and therefore accrue to the staff group as a whole.

A more detailed description of how we handle corruption and irregularities is set out in CISU's Anti-Corruption Policy (see section 5).

2.2.2 Reporting significant, questionable matters

If anyone at CISU becomes aware of, or has reasonable grounds to suspect, significant questionable matters, the information must be passed on immediately to CISU's management.

Examples of such matters may include:

- sexual exploitation
- abuse of power
- corruption

This applies both internally at CISU and in relation to our grant holders or their partners.

All options for reporting concerns, giving feedback and submitting complaints are

described in section 7. This section also includes guidelines for how CISU protects individuals who report matters as whistleblowers. That is, when serious matters are reported in confidence and with protection against negative consequences.

2.2.3 Business travel

When we at CISU travel abroad in connection with our work, we commit to living up to the same ethical and professional standards that we expect of our member organisations, grant holders and their partner organisations. In other words, we must display the conduct that we ourselves work to promote globally. It is important to stress, however, that our own safety always comes first. We never compromise if we are exposed to, for ex-

ample, extortion or threats. In such cases, the incident must be reported immediately to CISU's Secretariat management, so that it can be handled correctly and safely.



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3. Safeguarding

3.1 Definitions

betyder Safeguarding means protecting people's health, well-being and rights and ensuring that everyone can live free from the risk of harm, abuse and neglect. It is a shared responsibility to protect children, young people and adults.

In international contexts, the abbreviation "PSEAH" is often used, which stands for preventing sexual exploitation, abuse and harassment.

CISU has a zero-tolerance policy towards any form of sexual harassment, exploitation or abuse of power. This applies both internally within the organisation and in relation to all individuals and actors we work with, including member organisations, grant holders and their partners. Our approach is in accordance with Danish criminal law.

With respect for people's dignity and right to safety, CISU works actively to protect everyone who comes into contact with the organisation. Our work is based on both prevention and response: we launch initiatives that prevent violations, and we respond immediately to suspicion or confirmed cases. All cases are followed up so that we can implement sanctions, offer support and learning, and ensure the protection of those involved.

Responsibility lies with CISU's management, who work closely with an internal Code of Conduct group, a staff representative and a health and safety representative. The aim is to ensure effective and up-to-date policies and practices, so that CISU best possibly protects affected individuals while ensuring that all parties have the necessary legal safeguards.

3.2 Prevention of sexual harassment, exploitation and abuse of power

3.2.1 Within CISU

CISU supports an open and safe working environment in which everyone is treated with respect and the organisation's ethical guidelines are followed. All employees share responsibility for helping to develop and maintain this environment.

Management is responsible for ensuring the framework for a safe working environment in which no one is exposed to harassment, exploitation or abuse. Secretariat management ensures that all employees know their rights and obligations, and that CISU's safeguarding guidelines are known and understood.

Management works with staff groups to develop the necessary competences in this area, including through capacity building, exchange of experience and the involvement of external expertise where necessary.

3.2.2 Employees, the Board and members of grant assessment systems

Safeguarding forms a natural part of all recruitment and appointment processes at CISU. Job advertisements always refer to the Code of Conduct, and information about experience with safeguarding from previous workplaces may be obtained if needed.

- The newly elected Board is introduced to the Code of Conduct at the constitutive meeting and as part of the annual monitoring
- New employees and members of grant assessment committees are introduced to safeguarding as part of onboarding

- Safeguarding may be discussed at annual appraisal interviews (MUS), grant-system appraisal dialogues (GRUS) and management appraisal interviews (LUS)
- Safeguarding is also included in CISU's workplace assessments (APV)

3.2.3 Other actors

CISU also works to prevent sexual exploitation and abuse of power in cooperation with external actors. This happens through information, capacity building, contracts and cooperation agreements.

- All member organisations, grant holders and partners are informed that CISU has a zero-tolerance policy
- Safeguarding is written into all of CISU's contracts, and breaches may result in immediate termination of agreements
- CISU offers courses and organisational development processes that help member organisations establish their own safeguarding procedures

CISU recognises that some groups are particularly vulnerable, for example children and women in fragile or humanitarian contexts, where rights are under pressure. We therefore have a particular focus on protecting these groups. CISU is also HQAI-verified against the Core Humanitarian Standards (CHS), which supports our work across CISU's funding schemes.

3.3 Reporting sexual exploitation and abuse of power

CISU takes all reports of sexual exploitation and abuse of power seriously and investigates them thoroughly. Please refer to the complaints system for how to make a report (section 7).

3.3.1 Internally at CISU

It is part of CISU's working culture that everyone has a duty to respond if they experience or observe matters that go against our ethical principles. Any employee who becomes aware of matters that may constitute sexual exploitation or abuse of power must report it.

Reports may be made to:

- a member of CISU's management team,
- the staff representative or the health and safety representative,
- a colleague you trust, or
- via CISU's complaints system
- anonymously via CISU's Whistleblower Scheme

3.3.2 Externally

Anyone who has observed sexual harassment, exploitation or abuse of power in connection with CISU's work – either within the organisation itself or among member organisations, grant holders and partners – can report the case. This can be done anonymously and confidentially through CISU's Whistleblower Scheme (cf. section 7.5). Individuals who have personally been affected can report directly or through someone they trust.

3.3.3 Follow-up

CISU takes all reports seriously and investigates the cases thoroughly. In cases of sexual abuse or abuse of power, those affected are offered qualified crisis support as quickly as possible. This may include counselling, psychological support or other assistance, the costs of which CISU covers if the incident makes it necessary.

CISU provides information about complaints received and processed in the annual report, and whenever otherwise required. In its communication, CISU balances the consideration of transparency with the consideration of legal certainty and data protection rules.

FOTO: KIM JENSEN, CISU



4. Legal principles and guidelines

This section describes the legal principles that CISU follows in its management of public funds and in the processing of applications, complaints and reports. The principles form the legal basis for the processes described in section 7.

4.1 Legal basis

CISU is a private organisation and is therefore not covered by the Danish Public Administration Act (Forvaltningsloven) or the Danish Access to Public Administration Files Act (Offentlighedsloven). As we manage significant public funds through funding schemes from the Ministry of Foreign Affairs, CISU's Board has decided that CISU will voluntarily follow the principles of good administrative practice that apply to public authorities. CISU must treat similar cases alike and must not discriminate without objective grounds.

CISU, like all other organisations, is covered by the General Data Protection Regulation (GDPR) and the Danish Data Protection Act. For the sake of our legitimacy, we wish to be as open as possible in response to requests for access to information relating to our case processing, to the extent that confidentiality and data protection rules allow.

4.2 Core legal principles

CISU is not a public authority, but we have decided to follow several legal principles from the Danish Public Administration Act and the Danish Access to Public Administration Files Act, because we manage public funds. In addition, we highlight relevant principles from the General Data Protection Regulation (GDPR).

4.2.1 Undersøgelsesprincippet (official-principle)

We are subject to the so-called principle of investigation, also known as the official principle. This means that we are responsible for ensuring that all necessary and relevant information is available before a decision is made. It is we ourselves who

decide when we consider the available decision-making basis to be sufficiently informed. In our daily work, the principle of investigation means that we cannot reject an application because certain specific information is missing, for example basic data about a partner. Instead, we must ourselves ask for the information we are missing in order to be able to decide the case. The information must be sent to us within a reasonable deadline, otherwise we may reject the application.

Exception: applications that are clearly deficient in relation to the guidelines for the scheme in question may be rejected, as the very ability to formulate, describe and develop a project is part of the evidence that the applicant can carry out the task and manage the grant funds properly. The same applies to applications that clearly fall outside the guidelines for the scheme in question.

4.2.2 The principle of impartiality

It follows from Chapter 2 of the Danish Public Administration Act that everyone involved in case processing, assessment or complaint handling must be impartial. A person who is disqualified in relation to a case may not decide, take part in the case processing in connection with the decision, or otherwise be involved in the handling of that case. A person is disqualified if they, or someone close to them, has a personal or financial interest in an application or in the decision on it.

4.2.3 No "discretion under a rule"

The guidelines for the funding schemes contain many rules that must be interpreted on the basis of specific discretion. In connection with professional coordination and specific assessment practice, written or unwritten internal rules and practices will arise that help ensure smooth case processing and consistent treatment of applicants.

These internal rules must never become so rigid that discretion disappears, i.e. that

discretion is replaced by a fixed rule. The internal rules are only guiding and must never become so fixed that discretion disappears. Internal practices are guiding, not binding.

A specific assessment must always be carried out of every application within the guidelines of the scheme in question.

4.2.4 The principle of proportionality

This principle means that we may only impose requirements on applicants that are in reasonable proportion to the nature of the case and the size of the grant. This means, for example, that our requirements for the level of detail and documentation, etc. in applications must be in reasonable proportion to the amount applied for.

The principle does not apply the other way round: our administrative burden is not required to be proportionate to the case. We may, however, reject applications with reference to our resources, for example when processing applications that are clearly deficient.

4.2.5 Requirement for the right to be heard

(Chapter 5 of the Danish Public Administration Act)

It follows from Chapter 5 of the Danish Public Administration Act that if we receive new information in connection with an application that may be detrimental to the applicant and that is of significant importance to the decision, the applicant must be given the right to be heard before a decision is made. The right to be heard is exercised by sending the relevant information to the applicant, who must respond in writing within a reasonable deadline.

4.2.6 Duty to take notes

In connection with our processing of applications to the funding schemes, we are obliged to prepare a written note if we receive, orally or in some other way, information relating to the factual circumstances of a case that is of importance for the decision

on the case. This does not apply, however, if the information already appears from the documents in the case.

The note must be included in the case file and is subject to the right of access to information.

4.2.7 Duty to record

In connection with the processing of applications to the funding schemes, we are obliged to record all documents that are of importance to the decision on the case. The duty to record does not apply to documents of entirely minor importance. Documents are recorded on the case with the date of receipt or dispatch and are subject to the right of access to information.

4.2.8 Duty to provide guidance

It follows from section 7 of the Danish Public Administration Act that we have a duty to provide guidance and assistance to organisations applying for funds from the funding schemes. The duty to provide guidance means that we must, for example, inform applicants which application forms must be used, deadlines, guidelines, etc. The duty to provide guidance does not include a duty to advise applicants on how to structure their project or formulate their application, but this can form part of our service to member organisations.

4.2.9 Requirement for a statement of reasons in case of rejection

It follows from Chapter 6 of the Danish Public Administration Act that a full or partial rejection of an application, or an approval subject to conditions or reservations, must be justified in writing. If we approve an application without conditions or reservations, there is no requirement for a statement of reasons. The statement of reasons must refer to the rules (typically specific rules in the scheme's guidelines) on which the decision is based. If the decision is based on discretion, we must explain the main considerations that were decisive for the decision.

4.2.10 Duty of confidentiality

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

We are bound by a duty of confidentiality in relation to individuals' private compa-

nies' or organisations' interest in protecting information about their personal or internal, including financial, matters. This also applies to information that could be damaging to, for example, a partner organisation in a programme country if it were made public. The duty of confidentiality also applies in relation to public authorities such as the Ministry of Foreign Affairs. As a private organisation, we are not covered by section 28 of the Danish Public Administration Act on the disclosure of information to another public authority. As a rule, CISU will not disclose personal data to public authorities unless there is a statutory requirement to do so.

4.2.11 The right of access to information

The public and parties to a case generally have the right to obtain access to the documents and registers that we keep:

Access under the Danish Access to Public Administration Files Act (Chapter 2):

Alle Everyone has the right to request access to a case, etc. under the provisions of that Act. This applies regardless of whether they are a party to the case or otherwise involved in it. The right of access generally covers all documents that have been sent to us or created by us as part of our case processing.

There are, however, three important exceptions:

- a) our internal working papers,
- b) information on private, including financial, matters, and
- c) information that we are not authorised to disclose under data protection legislation (the GDPR).

Our internal working papers are, however, covered by the right of access if they contain information that is of importance to the case and does not appear from other documents in the case, or if they have been disclosed to outside parties and are therefore no longer internal.

Extended access (section 14 of the Danish Access to Public Administration Files Act and section 10 of the Danish Public Administration Act):

We have a duty, of our own motion, to consider extended access. This means we must consider whether we can grant access to what is requested, even if the person requesting access is not legal-

ly entitled to it. We must always consider whether there is, at bottom, anything preventing us from disclosing the documents. If we assess that there is nothing preventing the disclosure of documents in relation to the principle of extended access, the documents/information should be disclosed.

- Access must be granted as quickly as possible and within 7 working days, unless this is exceptionally not possible because of the scope or complexity of the case.
- CISU informs those covered by a specific request for access that access has been granted.

Access under the Danish Public Administration Act (Chapter 4):

This right only applies to parties to a case involving a decision. If you are a party to a case involving a decision, you have the right of access to all documents in the case.

This also applies to our internal working papers and documents if they contain information or assessments that are of importance to the case and do not appear elsewhere in the case, or if they were prepared as part of fulfilling the duty to take notes.

As we are not a public authority and only follow the administrative-law principles voluntarily, rather than because we are bound by the rules, we may be obliged to withhold access to personal data to the extent that such disclosure of personal data is not authorised under the General Data Protection Regulation (GDPR).

4.3 Principles for processing personal data

(Article 5 of the GDPR)

CISU is bound by the General Data Protection Regulation (GDPR), which, among other things, sets out a number of principles that apply to all processing of information about natural persons:

- We only collect and process personal data when it is lawful and fair to do so, and always with the greatest possible transparency towards the person whose data we process. We are open about the processing of personal data that we carry out.
- We only collect and process personal

data for explicit and legitimate purposes. If we have no relevant purpose for a given item of personal data, we do not collect it, or we delete it.

- We do not subsequently process information we have collected for purposes that are incompatible with the purpose of collection.
- We only collect and process personal data that is necessary and relevant for the purposes for which we collect personal data.
- We strive to minimise the scope of the personal data we collect to what is sufficient for the purpose.
- We make efforts to ensure that the personal data we collect is accurate and kept up to date. If we establish that personal data is inaccurate, we will correct or delete it.
- We do not store personal data for longer than we need it.
- When the purpose has been fulfilled, and we no longer have an objective reason to continue storing personal data, we will delete it in a secure manner.
- We process personal data in a secure manner and protect personal data against becoming known to unauthorised persons – including internally – as well as against accidental loss, destruction or damage.

4.3.1 Processing of ordinary personal data

(Article 6 of the GDPR)

We only collect and process personal data when we have a legal basis for the specific processing under data protection legislation (the GDPR). In relation to the personal data we mainly collect and process in our organisation, the legal basis will most often be:

- that the person concerned has given consent to the processing through a voluntary, specific, informed and unambiguous statement of intent,
- that the processing is necessary in order to enter into or perform a contract to which the person concerned is a party, or to process an application submitted by that person,
- that the processing is necessary in order for us to comply with a legal obligation to which we are subject,
- that the processing is necessary in order for us to pursue a legitimate

interest, unless the interests of the person concerned override this.

4.3.2 Processing of special categories of personal data

(Article 9 of the GDPR)

For certain special categories of information, it is more difficult to find a relevant legal basis. These special categories are personal data concerning racial or ethnic origin, political, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, health data, or data concerning a natural person's sex life or sexual orientation. As a general rule, we will not collect these categories of information.

In certain cases, however, we may have an objective and relevant purpose for collecting such information. In those cases, we will only collect and process the information if:

- the person concerned has given consent to the processing through a voluntary, specific, informed and explicit statement of intent,
- the processing is necessary for us to comply with our obligations under employment, health and social law, insofar as this has a basis in law or a collective agreement,
- the processing is necessary to establish, exercise or defend legal claims.
- We only collect and process a person's civil registration number (CPR number) when:
- it follows from law that we must or may process CPR numbers, the conditions for processing special categories of personal data are met, or the person concerned has given consent.

4.3.3 Rights of the persons whose data we process

(Articles 12-23 of the GDPR)

Personer, Persons whose data we process have a number of rights under data protection legislation. These include the right to:

- receive information about our collection and processing of personal data,
- request access to the personal data we process about them,
- have inaccurate personal data cor-

rected by us,

- in certain situations, have all or some of their personal data deleted by us,
- in certain circumstances, have processing restricted to storage only,
- have certain personal data that they have themselves provided to us delivered in a structured, commonly used and machine-readable format, and to have this data transferred to another data controller,
- object to our processing of personal data, including an unconditional right to object to the processing of personal data for the purposes of direct marketing,
- withdraw a given consent, and
- lodge a complaint with the Danish Data Protection Agency about our processing of their personal data.

We will assist, facilitate and support the exercise of individuals' rights, and respond to enquiries without undue delay and no later than one month after receipt of the enquiry.

4.4 Consequences for work processes

4.4.1 General remarks on the right of access to information

For the sake of our legitimacy, we at CISU wish to be as open as possible in connection with requests for access to information. However, in every decision on access, we must also comply with the rules of the General Data Protection Regulation. This may mean that we cannot disclose personal data that would otherwise have been capable of disclosure under the access rules.

- Under the rules on party access under the Danish Public Administration Act, we must disclose all documents, as well as relevant internal documents, notes, emails, etc. that form part of a case to which the person or organisation concerned is a party.

As a general rule, content from the database, drafts of internal minutes, advisory notes, etc. should only be disclosed if they contain material information or assessments of importance to the case that can only be found there.

- In connection with a request for access under the Danish Access to

Public Administration Files Act, this will often only cover documents that form part of the case processing and management of applications to the funding schemes – not information relating to advisory or course activities. The consideration of openness must be weighed against our duty to protect the applicant organisation's financial interests under the rules on confidentiality.

Applications to the funding schemes and their annexes are covered by a request for access, but we must ensure that any personal data is exempted under the provisions of the Danish Access to Public Administration Files Act. In practice, we redact information by blacking it out before we respond to a request for access and disclose the documents.

Extended access on our own initiative means that, when processing a request for access, we must consider whether access can be granted to more documents and information than we are immediately obliged to provide.

It must therefore always be considered whether there is, at bottom, anything preventing the disclosure of documents that could otherwise be exempted from access. If there is nothing preventing the disclosure of documents, etc., the documents/information should be disclosed as part of the principle of extended access.

- Access must be granted as quickly as possible and within 7 working days, unless this is exceptionally not possible because of the scope or complexity of the case.
- CISU informs those covered by a specific request for access that access has been granted.

4.4.2 Access to information regarding operations and administration

Our internal accounts, expense vouchers, etc. are, as a general rule, covered by the right of access under the Danish Access to Public Administration Files Act.

4.4.3 Access to information in the grant process

All communication between grant consultants and the grant assessment committee and its members is covered by the right of access under either the Danish Public Administration Act or the Danish Access to Public Administration Files Act. The same applies to communication between grant consultants and other Secretariat staff as part of case processing, including, for example, emails and notes prepared on the basis of oral communication. Communication between members of the grant assessment committee among themselves, and between grant consultants among themselves, is, by contrast, internal documentation that is not covered by the right of access.

4.4.4 Duty of confidentiality

Applications to the funding schemes and their annexes are covered by CISU's duty of confidentiality, to the extent that they contain personal or sensitive information about applicants or their partner organisations. The same applies to information and matters that have come to light in connection with courses and advisory services, unless this information forms part of the specific case processing of an application to a funding scheme or a grant. Breach of the duty of confidentiality may be a criminal offence under section 152 of the Danish Criminal Code. Applications, etc. may be published following prior written approval from the organisation concerned, unless we are obliged to disclose them in connection with a request for access.

4.4.5 Duty of confidentiality in relation to the Ministry of Foreign Affairs

CISU's staff are bound by a duty of confidentiality in relation to the Ministry of Foreign Affairs and other public authorities. The duty of confidentiality must be interpreted such that we do not disclose any form of information about member organisations or applicants to the funding schemes that could be damaging to them in connection with their future relationship with the authority concerned, unless this forms part of agreed and established procedures in connection with the handling of cases.

Information and documents covered by the right of access under the Danish Access to Public Administration Files Act can, as a general rule, always be disclosed to the relevant authorities.

4.4.6 Duty to take notes in the grant process

Information received orally by grant consultants during the grant process is covered by the duty to take notes. The same applies to information that emerges orally at meetings of the grant assessment committee and that has an influence on the decision on the case. The discussion itself within the grant assessment committee is not covered by the duty to take notes.

4.4.7 The principle of investigation

Grant consultants have both the right and the duty to obtain any information that may be missing from an application, in order to be able to reach as accurate a decision as possible. The information may be obtained from the applicant or, to the extent that it concerns information, from other staff in the Secretariat. The latter applies, for example, to information about whether an applicant has received advice, but not about the specific content of that advice.

4.4.8 Processing of personal data

We process personal data in accordance with the General Data Protection Regulation and the Danish Data Protection Act, and these principles are set out in our [Privacy Policy](#).

5. Anti-corruption, irregularities and reporting

5.1 Target group

CISU's Anti-Corruption Policy describes our principles for preventing and addressing corruption, fraud and misuse. The policy applies:

- to CISU as an organisation
- to all grant holders under CISU's funding schemes
- to some extent also to other actors that CISU works with

5.2 Objective: to avoid corruption, fraud and misuse altogether

CISU does not accept any form of corruption, fraud or misuse, whether internally within the organisation, among partners, member organisations or grant holders under CISU's funding schemes.

We work actively on prevention, so that the risk of irregularities is minimised, as well as on follow-up and monitoring, so that suspicions or confirmed cases are dealt with consistently.

We recognise that Danish civil society organisations often work in countries where social and economic conditions can make corruption more widespread.

We therefore expect our member organisations, grant holders and their partners to do their utmost to avoid and prevent corruption, even though they may be affected by the problem through no fault of their own.

CISU considers prevention to be the most important area of effort. The aim is to avoid irregularities but if they nevertheless occur, we must limit the consequences and ensure adequate and reasonable follow-up that is proportionate to the seriousness of the case.

Prevention is closely linked to the development of legitimate, transparent and democratically controlled organisations in programme countries.

This means, for example, that management and staff are held accountable by boards, members and target groups.

5.3 Definitions

Corruption is understood as: abuse of entrusted power and funds for personal gain.

Personal gain may be for oneself, but also for family, friends, networks or other platforms that strengthen one's position.

Misuse of funds can take many forms, for example:

- fraud in connection with audits
- deliveries that have not been agreed
- incorrect prices or equipment
- false invoices for staff or equipment
- bribery or the acceptance of gifts
- misuse of resources or business travel
- theft

Abuse of entrusted power can also take many forms, for example:

- psychological, physical or sexual violations
- discrimination
- unwarranted allocation of privileges
- abuse of relationships in connection with recruitment or other decisions

5.3.1 Scope

This section focuses primarily on the misuse of funds. Other parts of the Code of Conduct address related themes such as abuse of power and discrimination.

5.3.2 Corruption in practice

There is no single, unambiguous definition of corruption. Inspired by the practice of

the Ministry of Foreign Affairs, CISU regards the following actions as corrupt or dishonest practice (the list is not exhaustive):

- **Fraud:** deliberate acts for personal gain, e.g. extortion, collusion, nepotism (favouring family/friends), theft, embezzlement, forgery of documents or inflated prices
- **Corruption:** offering or accepting payment beyond normal rates in return for special services or faster case processing
- **Misuse of funds:** using money or assets (e.g. project vehicles, telephones) for purposes other than the project, or failing to maintain assets
- **Serious irregularities:** for example, inadequate bookkeeping, missing or delayed financial reporting to partners/donors, or other management failures
- **Acceptance of gifts or services:** it is not permitted to ask for or accept gifts that could influence work or decisions. Only entirely symbolic gifts (e.g. pens or calendars) are acceptable – never gifts of value, not even when given to family members
- **Secrecy or concealment:** hiding relevant information or possible conflicts of interest, e.g. close family relationships, shareholdings or joint ownership in companies or organisations that one cooperates with

5.4 CISU

CISU must neither actively nor passively be involved in corruption, bribery or fraud, cf. the definitions above.

Regardless of local customs and traditions, CISU never compromises on the organisation's integrity. This means that we neither in Denmark nor abroad give, facilitate, request or accept gifts or services of more than symbolic value that could affect our judgement or impartiality.

5.5 Member organisations

CISU works actively to prevent member organisations and their partners, regardless of local conditions, from being involved in corruption or bribery in any way. This also applies in countries where it may be a common part of society.

We support member organisations and their partners by:

- sharing views, knowledge and methods for the prevention of corruption, fraud and misuse
- offering advice, courses and tools
- sharing materials, for example via our website

CISU also helps member organisations and grant holders clarify suspicions and act quickly and appropriately in cases of established corruption, fraud or misuse. This happens through advice, sparring, help with reporting, and in cooperation with the Ministry of Foreign Affairs, including any support for legal clarification.

We regard it as an expression of good practice and organisational strength when an organisation that, without intent and inadvertently, becomes involved in corruption or bribery is open about its experiences and immediately takes the necessary steps to deal with the situation.

5.6 Grant holders under CISU's funding schemes

All grant holders under CISU's funding schemes undertake to manage funds in accordance with the guidelines of the schemes and the requirements of the Ministry of Foreign Affairs. This includes, among other things, the duty to prevent and counter corruption, fraud and misuse.

- All grant holders sign to confirm that they comply with the anti-corruption clauses of the Ministry of Foreign Affairs and/or the EU
- If a reasonable suspicion arises, or theft, fraud, corruption, misuse or other irregularities are established, the Danish organisation is obliged to report this to CISU within 14 days

CISU is obliged to act actively on any information pointing to fraud, misuse of funds or corruption. We do this in loyal cooperation with the organisations, so that grant holders and member organisations can confidently seek advice and guidance from us, both in cases of suspicion and in confirmed cases.



FOTO: KIM JENSEN, CISU

5.7 Reporting of irregularities and suspicion of corruption

Grant holders and their partners are obliged to report all significant irregularities in connection with the implementation of activities supported by CISU. This obligation follows both from the grant contracts and from CISU's administrative guidance.

Reports are handled seriously and professionally and will not be met with reprisals or discriminatory treatment on the part of CISU. If, on the other hand, false accusations are demonstrably made, CISU may take action, for example:

- disciplinary measures against employees (warning, dismissal or summary dismissal)
- termination of contractual relations with grant holders or suppliers
- reporting to the police in criminal matters
- claims for compensation for financial loss

All reports of irregularities and corruption in CISU-funded projects are handled in accordance with the Ministry of Foreign Affairs' guidelines for funding schemes, the grant contracts and the cooperation agreements between grant holders and partners. The following mandatory anti-corruption clause is included in all contracts:

"No offer, payment, consideration or benefit of any kind, which could be regarded as an illegal or corrupt practice, shall be made – neither directly nor indirectly – as an inducement or reward in relation to tendering, award of the contract, or execution of the contract. Any such practice will be grounds for the immediate cancellation of this contract and for such additional action, civil and/or criminal, as may be appropriate. At the discretion of the Danish Ministry of Foreign Affairs, a further

consequence of any such practice can be the definite exclusion from any tendering for projects, funded by the Danish Ministry of Foreign Affairs."

5.7.1 How to report irregularities and suspicion of corruption

All grant holders under CISU's funding schemes must report to CISU immediately if they discover, or have reasonable grounds to suspect, fraud, corruption, misuse or other irregularities.

Reports are made via [this form](#).

5.7.2 When to report irregularities and suspicion of corruption

A report must be made immediately, and no later than within 14 days, if:

- significant difficulties arise in carrying out the activity, including in relation to the budget
- serious problems arise in relation to authorities in the recipient country, the partner organisation or deployed staff
- there is reasonable suspicion of theft, fraud, corruption or misuse of CISU funds,
- suspicion arises of misuse of funds from other donors, where the same individuals in CISU's management are involved in a grant from CISU
- an internal or external investigation is initiated (e.g. an external audit or a legal investigation)
- significant political risks arise, or there is a risk of damage to the reputation of the organisation or of CISU

5.7.3 Processing of reports

All reports are recorded in CISU's case management system and reviewed thoroughly. If CISU assesses that there is a reasonable suspicion of fraud, corruption, misuse or

other irregularities in a grant funded by CISU, CISU is obliged to forward the report to the Ministry of Foreign Affairs (MFA).

Before the report is forwarded, CISU reviews it with the organisation concerned. The MFA then decides whether the case should be sent on to the Auditor General (Rigsrevisionen) and registered as a C-case (Corruption case).

All C-cases are published on the website of the MFA/Danida, with information and status, in accordance with the GDPR. Half-yearly status reports must be prepared by both the grant holder and CISU until the case is concluded.

5.7.4 Composition of the reporting group

CISU has set up a special working group to handle reports of irregularities and suspicion of corruption. The group consists of one or more grant advisers and a controller, who report to the Head of Funding and the Head of Secretariat.

The reporting group can ask everyone at CISU to help clarify a case. In special cases, the group may involve an external expert to achieve the best possible outcome.

The general rules on impartiality naturally also apply to the members of the group (cf. section 4.2.2).

5.7.5 Decisions of the reporting group, the MFA and the Auditor General

When CISU receives a report, an assessment is made of whether there is a reasonable suspicion of, or documented, irregularities. If this is the case, the report is sent to the MFA.

After that, it is exclusively the MFA and the Auditor General who can make decisions in the case, including on the conclusion of the case or requirements for repayment. A case is only concluded once it has been sufficiently clarified, and once consequences have been drawn that are in reasonable proportion to the nature and scope of the case.

The MFA publishes ongoing status and follow-up on cases on its website in cooperation with the Auditor General.

At CISU, we distinguish between three types of enquiry relating to grants and the organisations or individuals involved in CISU-funded projects:

- **Reports:** used by grant holders and their partners to report irregularities in their own projects or among their own partners
- **Complaints mechanism:** used in cases concerning conduct on the part of CISU, grant holders or member organisations
- **Whistleblowing:** used for serious matters where the reporting person needs protection, including the possibility of anonymity and protection against reprisals

6. Security

6.1 General security

6.1.1 Legal security

CISU works in accordance with the legal principles described in Chapter 4 (Legal principles). All contracts with employees, consultants, suppliers, etc. are stored securely and in full compliance with applicable legislation on personal data and accounting.

CISU has an ongoing insurance agreement with Willis Towers Watson, which covers occupational injuries, business insurance, business travel insurance, and Board and professional liability. Regular meetings are held with Willis, and CISU has both a fixed contact person and access to round-the-clock support.

6.1.2 Financial security

CISU's bank accounts are administered through a major Danish bank and with B and C authorisations, which ensure that no one has sole access to the accounts.

- Wireless keyboards are not used for online banking access, to avoid security risks
- All bank accounts are reconciled on an ongoing basis by the controller
- Bank reconciliations form part of both unannounced and annual audit reviews
- Audit assignments are put out to tender every 3–5 years, and in the case of longer-term cooperation, a change of staff at the audit firm is required to ensure independence

6.1.3 Cooperation on staff safety

Close cooperation has been established between CISU's management and staff on the working environment and safety. CISU has an elected health and safety representative, who:

- coordinates workplace assessments (APV)
- assists in specific working environment cases
- takes part in the cooperation committee, where the workplace assessment is discussed twice a year

Working environment matters form part of both the Secretariat's policies and the physical framework of the office.

CISU's management also strives to be available around the clock, so that staff can receive support in the event of safety-related incidents.

6.1.4 Physical security

CISU's office in Aarhus is protected by a joint Falck subscription, fire safety systems and an alarm system.

The workplace assessment (APV) ensures that rules on office layout and indoor climate are complied with. All workstations are equipped with ergonomic furniture, and special needs are met following a specific assessment and within budgetary constraints.

6.1.5 Communications security

CISU has an internal IT group and cooperates with an external IT provider, who is responsible for all systems. To protect data and communication, we use:

- Passwords
- Antivirus software
- Backup solutions
- Global Secure Access for secure external access

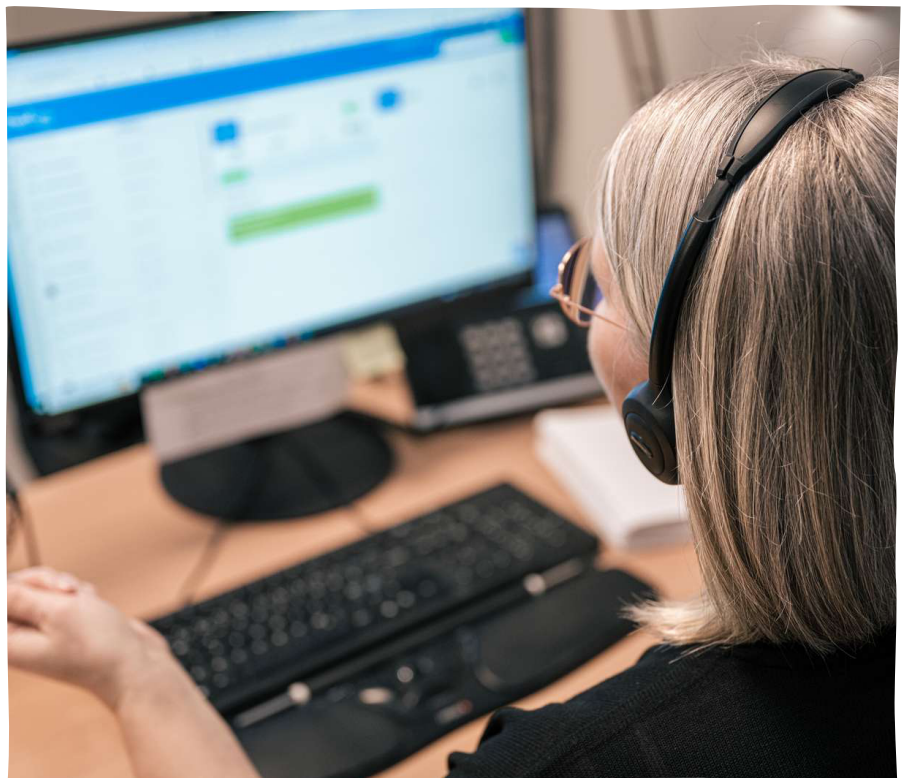
For business travel to high-risk areas, CISU can lend out cleaned laptops and mobile phones with local SIM cards to increase data security.

6.2 Security on international travel

CISU has prepared clear guidelines on security and contingency planning for staff business travel abroad. All CISU employees are covered by the organisation's insurance policies. External consultants are themselves responsible for ensuring they have insurance cover. The guidelines can be sent on request.

If questions or doubts arise about the security of a specific trip, it is CISU's management that makes the final decision on whether the trip goes ahead.

FOTO: KIRSTEN ADLER



7. Complaints to CISU

7.1 Introduction and principles

Anyone can submit a complaint to CISU. Complaints can concern any of CISU's areas of work, including matters covered by this Code of Conduct.

CISU wants to promote an open, fair and safe complaints culture, in which access to complain is straightforward, the case-processing procedure is transparent, and decisions are reasoned. On this basis, all complaints must always be submitted in writing.

Please note: as a general rule, complaints are not handled anonymously, since CISU must, in relevant cases, be able to establish the complainant's entitlement to complain and ensure a proper process. If there is a need for anonymity or protection, the matter must be submitted as whistleblowing.

Complaints submitted will never be met with reprisals or discriminatory treatment on the part of CISU. If, on the other hand, false accusations are made, CISU may take action, such as:

- disciplinary sanctions against its own employees (warning, dismissal or summary dismissal)
- termination of contractual relations with grant holders and suppliers
- reporting to the police in the case of criminal matters
- claims for compensation

Types of complaint

Complaints are divided into three main categories:

- Grant complaints (K1): complaints about formal errors in case processing within CISU's grant assessment system
- Internal complaints (K2): complaints about internal matters at CISU, including staff, management and the Board
- External complaints (K3): complaints about grant holders and partners in connection with the implementation of CISU-funded activities

The Whistleblower Scheme is used when the nature of the matter, or the complainant's safety, means that protection is needed. (See section 7.5)

CASE-PROCESSING PROCEDURE FOR WHISTLEBLOWER CASES

When CISU receives a report under the Whistleblower Scheme:

A. It is submitted to CISU via the available channel (email)

B. CISU's designated complaints officer receives the complaint, confirms receipt and registers it

C. A complaints panel is set up, consisting of the Secretary General and the Chairperson

D. An initial assessment is made of whether the matter falls within the scope of the Whistleblower Scheme

E. CISU decides whether a closer investigation should be initiated. The investigation may be carried out internally or with assistance from either an in-house lawyer or an external adviser

F. The case is investigated, and relevant parties may be involved, having regard to confidentiality and on the basis of the relevant rules and procedures. Before CISU decides on any measures, the person who reported the matter to CISU will be given the right to be heard

G. CISU decides how the matter is best dealt with responsibly and confidentially, and on the basis of the relevant rules and procedures

H. A decision is made on the complaint, and the relevant parties are informed of the outcome

CASE-PROCESSING PROCEDURE FOR COMPLAINTS

All types of complaint (K1, K2 and K3) are handled following the same procedure:

A. The complaint is submitted to CISU via the available channels (email or web form)

B. CISU's designated complaints officer receives the complaint, confirms receipt and registers it

C. The complaints officer informs management and/or the Board of the complaint

D. A complaints panel is set up in accordance with the applicable guidelines for that type of complaint

E. The complaint is handled confidentially and on the basis of the relevant rules and procedures

F. A decision is made on the complaint, and the relevant parties are informed of the outcome

7.2 Complaints about processing in CISU's grant assessment system (Grant Complaints) [K1]

7.2.1 What does this type of complaint cover?

Applicants to CISU's funding schemes can submit a complaint if they believe that a formal error has occurred in the case processing or in the procedure of the grant assessment committee. This concerns cases where procedures or rules have not been followed correctly.

There is a formal error if:

- one or more of the core legal principles (cf. section 4.2) has not been complied with
- assessment criteria other than those set out in the scheme's guidelines have been applied
- requirements have been imposed on the applicant or the application that are not described in the scheme's guidelines

You cannot complain about:

- discretion and professional assessments
- priorities set by the grant assessment committee
- disagreement about the calculation or proportionality of the grant

It is important to note that you cannot complain about a decision merely because you disagree with the discretion or the assessments made by grant managers, grant consultants or the grant assessment committee. Complaints can therefore only concern formal errors in the process, and not disagreement with the professional assessment itself.

7.2.2 How to submit a complaint

All applicants can submit a complaint using this form: [How to submit a complaint](#)

The form can either be submitted directly via the link or downloaded and sent to complaints@cisu.dk.

The complaint must address the following:

- 1. A clear statement of which formal error is alleged to have occurred
- 2. A description of how the error affects the case
- 3. A statement of what the complaint seeks to achieve

Complaints without the above information will be rejected.

7.2.3 Complaint deadline

A complaint must be submitted no later than four months after the applicant received the decision from CISU.

7.2.4 Composition of the complaints panel

Complaints about case processing are handled by a special complaints panel.

The panel consists of three people:

- Two members of CISU's Board
- One representative of CISU's management

With a majority of Board members, the panel functions as a kind of independent appeal body. The Board's representatives on the panel are appointed on a rotating basis.

If a Board member, or a partner of a Board member, brings a K1 complaint, the panel will consist of:

- A representative of the chairpersons
- CISU's internal auditor
- One representative of CISU's management

If a member of the panel is disqualified, they are replaced by an external resource person, appointed by the two remaining members of the panel.

The panel may, where necessary, request assistance from relevant individuals at CISU, including a representative of the grant assessment committee concerned, in establishing the facts of the case. In entirely special cases, the panel may engage an external expert or similar to help ensure the best possible basis for its decision.

The general rules on impartiality naturally also apply to members of the panel and are checked before the panel is appointed (cf. section 4.2.2).

7.2.5 Possible decisions

The panel decides complaints about case processing by simple majority vote. The following decisions are possible:

A. The complaint is rejected. This may happen, for example, if:

- the complaint concerns something

that cannot be complained about

- the complaint is based solely on disagreement with the discretion and considerations applied in the case processing
- the complainant is not entitled to complain
- the complaint deadline has been exceeded

B. The decision of the grant assessment committee is upheld: If the panel finds that no formal error was made in the case processing, the decision is upheld. A decision may also be upheld even if minor formal errors have been found, if these are assessed to be immaterial, i.e. correcting the error(s) would not have affected the outcome of the decision. In such cases, the decision may be accompanied by criticism.

C. The case is remitted for renewed processing: If the panel finds that a significant formal error has been made that may have influenced the outcome of the decision, the case is remitted for renewed processing. Renewed and error-free processing within the grant assessment system may in that case lead to a different decision. Renewed processing takes place before a new grant assessment committee, in order to best ensure an objective decision.

A complaint case cannot result in a decision that leaves the complainant worse off than their starting position. This means, for example, that a complaint about a partial grant cannot end in a complete rejection.

The panel's decision is final and cannot be appealed to any other administrative authority.

The management representative on the panel is also responsible for:

- informing the grant assessment system if a complaint concerns an application in respect of which a member has prepared the recommendation. In this connection, the panel may ask the member to clarify points in the complaint, and the management representative will explain the further process
- informing the grant assessment system when the decision has been made
- informing the Secretariat of the decision and any lessons learned in

connection with the assessment of professional practice

- ensuring that the relevant adviser at CISU shares lessons from the complaints process with the grant assessment system at the next calibration meeting and Professional Day

7.2.6 Case-processing time of the panel

The panel must have completed processing a complaint and informed the complainant of the decision no later than four months after the complaint was received in writing by CISU.

7.3 Complaints about internal matters at CISU [K2]

7.3.1 What does this type of complaint cover?

Complaints can be submitted via the form on CISU's website: [How to submit a complaint](#)

The form can either be submitted directly on the page or downloaded and sent to complaints@cisu.dk.

Before submitting a complaint, it is always possible to contact a CISU employee, a management representative or a Board member by phone, or to ask in person for guidance on a specific situation. Such contact is not regarded as a formal complaint until it has been received in writing.

To ensure that the complaint can be handled correctly, the form must answer the following:

- **1. What is the complaint about?**
 - a. Breach of safeguarding principles, and if so which (e.g. harassment, exploitation or abuse)
 - b. Who the complaint concerns (staff member, management representative, Board member, etc.)
 - c. A description of the specific situation, including time, place and actions
- **2. A statement of what the complaint seeks to achieve**

Complaints that do not address the above will be rejected.

7.3.3 Complaint deadline

The complaint must be submitted as soon

as possible, and no later than four months after the incident, or after the complainant became aware of the matter complained of.

7.3.4 Composition of the complaints panel

The composition of the panel depends on who the complaint concerns:

- **Complaints about staff:** the panel consists of the Chairperson, the Deputy Chairperson and a management representative. The Trade Union representative or a support person may, by agreement with the staff member, be involved in the investigation.
- **Complaints about CISU's management:** the panel consists of the Chairperson, a management representative who is not covered by the complaint, and the internal auditor. If the complaint concerns the whole of CISU's management, the panel consists of the Chairperson, the Deputy Chairperson and the internal auditor.
- **Complaints about the Board:** the panel consists of the Chairperson, the Deputy Chairperson and the internal auditor. If the case requires it, an external resource person with relevant competences may be involved. If the complaint concerns the Chairperson or the Deputy Chairperson, they are replaced by an external resource person appointed by the internal auditor, together with the internal auditor. If the complaint concerns the whole Board, the panel consists of the internal auditor, an external resource person appointed by the internal auditor, and a management representative.

The panel may involve any relevant individuals at CISU to establish the facts of the case. In special cases, an external expert may be engaged to ensure a solid basis for the decision.

The general rules on impartiality in section 4.2.2 apply to all complaints panels.

7.3.5 Decisions of the panel

Regardless of the outcome, the complainant and any other parties involved will be informed of the decision on the case. The Ministry of Foreign Affairs will

be informed if the case is relevant to CISU's agreements with the Ministry of Foreign Affairs. The following decisions are possible for this type of complaint:

- **A.** Rejection, with reasons given to the complainant
- **B.** Complaint upheld, referred for handling by the Secretariat, if the complaint is legitimate but falls outside the mandate of the complaints system, e.g. complaints about working conditions or other HR-related complaints concerning the employment relationship
- **C.** Complaint upheld, referred for handling by another actor (e.g. the police), if the complaint is legitimate but falls outside the mandate of the complaints system, e.g. complaints about criminal matters

The panel's decision is final and cannot be appealed to any other administrative authority.

7.3.6 Case-processing time of the panel

CISU strives for orderly and conscientious case processing, so that complaints are handled both quickly and responsibly. The following therefore applies:

- A complaints panel must be set up, and processing of the complaint begun, within two months
- How quickly the complaint can be concluded depends on its complexity and nature
- We always strive for a efficient and fair a process as possible under the given circumstances

7.4 Complaints about grant holders and partners in connection with CISU-funded activities [K3]

7.4.1 What does this type of complaint cover?

Anyone can complain to CISU about grant holders and partners in the case of suspected potential breaches such as harassment, exploitation, abuse, violence, and other unethical conduct within activities supported by CISU's funding schemes.

Complaints about matters that fall within activities supported by CISU's funding schemes must be raised and handled as close to the activity as possible (cf. the principle of subsidiarity). For example, complaints from the target group should, as a general rule, be directed to the local partner. If the partner is the cause of the complaint, it is directed to the next level, most often the Danish organisation/grant holder at CISU. There may be several links in the chain, and CISU will, in most cases, be the last instance that can or should handle the complaint.

CISU thus receives and handles all complaints concerning the Danish organisation/grant holder, and may in special cases also choose to handle complaints from target groups, local partners and other implicated actors, cf. among other things the Core Humanitarian Standards (CHS).

7.4.2 How to submit a complaint

Complaints can be submitted via the form on CISU's website: [How to submit a complaint](#)

The form can either be submitted directly on the page or downloaded and sent to complaints@cisu.dk.

Before submitting a complaint, it is always possible to contact a CISU employee, a management representative or a Board member by phone, or to ask in person for guidance on a specific situation. Such contact is not regarded as a formal complaint until it has been received in writing.

To ensure that the complaint can be handled correctly, the completed form must answer the following:

1) What is the complaint about?

- a. Breach of safeguarding prin-

ciples, and if so which? (e.g. harassment, exploitation or abuse). Breach of anti-corruption, legal and/or ethical principles – if yes, which; misuse of funds, breaches of the law, etc.

- b. Who the complaint concerns (grant holder's/partner's Board, management, staff, etc.)

- c. A description of the specific situation, including place, time and actions

2) A statement of what the complaint seeks to achieve

Complaints without the above information will be rejected.

7.4.3 Complaint deadline

The complaint must be submitted as soon as possible, and no later than six months after the incident, or after the complainant became aware of the matter complained of.

7.4.4 Composition of the complaints panel

Complaints panels handling complaints relating to the implementation of CISU-funded activities must consist of at least three people: one Board member and two people from Secretariat management. The panel may, as needed, be expanded with relevant staff from CISU's Secretariat. Board representation on the panel follows a rotating principle.

The panel may, in investigating the case, ask everyone at CISU to help establish the facts. In entirely special cases, the panel may engage an external expert or similar to help ensure the best possible basis for its decision.

The general rules on impartiality apply to the composition of the panel (cf. section 4.2.2).

7.4.5 Decisions of the panel

There are four possible decisions for this type of complaint. Whatever decision is made, the complainant and any other parties involved will be informed of the outcome of the case. If the case has relevance for CISU's agreements with the Ministry of Foreign Affairs, the Ministry will also be informed.

- A. Rejection, with reasons given to the complainant

- B. Complaint upheld, referred for handling by the grant holder or other partner organisation

- C. Complaint upheld, referred for handling by the Secretariat, if the complaint is legitimate but falls outside the mandate of the complaints system, e.g. complaints about working conditions or other HR-related matters

- D. Complaint upheld, referred for handling by another actor (e.g. the police), if the complaint is legitimate but falls outside the mandate of the complaints system, e.g. complaints about criminal matters

The panel's decision is final and cannot be appealed to any other administrative authority.

7.4.6 Case-processing time of the panel

CISU strives for orderly and conscientious case processing, so that complaints are handled both quickly and responsibly. The following therefore applies:

- A complaints panel must be set up, and processing of the complaint begun, within two months
- How quickly the complaint can be concluded depends on the complexity of the case
- We always strive for as efficient and fair a process as possible under the given circumstances

7.5 Whistleblower Scheme

7.5.1 Definitions and basis

The Whistleblower Scheme is a way of drawing CISU's attention to serious or questionable matters that might otherwise be difficult to raise. The purpose is to ensure that serious problems are detected in time and dealt with responsibly and safely.

CISU follows Transparency International's definition of whistleblowing:

"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."

This means that information about unlawful or seriously questionable matters relating to activities supported by CISU's funding schemes and/or CISU's staff is covered by the Whistleblower Scheme.

The scheme is based on applicable Danish legislation and applicable EU rules and is intended to make it possible to draw attention to serious matters in a safe and responsible way. All cases are handled objectively, factually and with respect for all parties involved.

The Whistleblower Scheme can be used in connection with:

- Complaint type 2: complaints about internal matters or individuals at CISU
- Complaint type 3: complaints about grant holders and partners in connection with CISU-funded activities

The scheme does not apply to complaint type 1 (complaints about case processing within the grant assessment system).

Examples of matters that can be reported through whistleblowing:

- Corruption, fraud or misuse of funds
- Sexual exploitation, abuse, harassment (SEA)
- Serious breaches of safeguarding
- Violence, threats, serious discrimination
- Gross unreasonableness or abuse of power
- Attempts to conceal unlawful conduct
- Serious breaches of human rights in connection with projects

The Whistleblower Scheme is not intended for:

- ordinary personnel matters,
- disagreements, difficulties in cooperation or matters relating to well-being,
- minor professional errors and misunderstandings.

7.5.2 Who can submit a whistleblower report?

Anyone can submit a whistleblower report, including:

- CISU's employees and Board members,
- partners and consultants,
- target groups and participants in activities supported by CISU,
- any external person who becomes aware of a serious matter.

7.5.3 How to report through the Whistleblower Scheme

Anyone can submit a report via CISU's form: [Whistleblower Scheme](#)

If the whistleblower wishes to make use of the Whistleblower Scheme, this can be indicated in the form. If it is not indicated, CISU itself will assess whether the nature of the matter is covered by the Whistleblower Scheme.

CISU is aware that whistleblowers may be under pressure, and we therefore strive to make it as simple and safe as possible to report. CISU protects whistleblowers against reprisals from the individuals or organisations they report on, including employers or others they may be dependent on.

- The whistleblower's identity is protected, and it is possible to report anonymously. Reporting must always be a safe alternative to remaining silent.
- The whistleblower must have had reasonable grounds to believe that the information concerns matter covered by the scheme.
- No sanctions will be imposed if a report turns out to be unfounded.

If it is demonstrated that a report has been submitted in bad faith or with false accusations, CISU may take relevant action. This may include disciplinary measures against its own employees (warning, dismissal or summary dismissal), termination of contractual relations with grant holders or suppliers, reporting to the police in the case of criminal matters, or claims for compensation.

Whistleblowers always have the right to go to the relevant authorities without first reporting to CISU.

7.5.4. Rights of individuals who are reported

The Whistleblower Scheme must ensure that serious matters can be reported, but also that individuals named in a report are treated fairly. The party concerned therefore has the following rights under Danish legislation and EU rules:

Confidentiality: All information is handled with a high degree of confidentiality. Only relevant individuals with responsibility for the case have access to it.

Information: Den The party concerned will, as far as possible, be informed of the report and its content. This information may, however, be

postponed if this is necessary out of consideration for the investigation.

The right to be heard: Before CISU decides on any measures, the party concerned must have the opportunity to state their views.

Protection against unwarranted consequences: If the report proves to be unfounded, this must not have negative consequences for the party concerned. In that case, the matter is concluded confidentially and with respect for the person's reputation.

7.5.5 Deadline for reporting

A report must be made as quickly as possible after the incident, or after the whistleblower becomes aware of the matter.

7.5.6 Processing of reports

Reports are assessed by CISU's Secretary General and Chairperson. They decide whether the case should:

- be handled as a K2 case (internal matters),
- be handled as a K3 case (matters concerning grant holders or partners),
- be referred to the relevant authority, if the matter falls outside CISU's mandate,
- be referred to the grant holder, if the matter can be lawfully and responsibly handled locally.

CISU cannot itself handle matters where CISU:

- is not the employer,
- is not a party to the contract,
- does not have legitimate access to the data or actors concerned,
- or where legislation requires that a national authority handle the case.

In such cases, CISU will not initiate a full investigation but will ensure that the whistleblower is referred to the correct body.

8. Anti-terror

8.1 Introduction

The Danish Ministry of Foreign Affairs requires that all funding schemes, including CISU's, implement an anti-terror clause. The clause obliges us to prevent any form of connection to terrorism and to comply with applicable international sanctions. Breach of this obligation may result in agreements being terminated and funds having to be repaid.

Requirements for grant holders and local partners

- According to CISU's funding guidelines, it is the responsibility of the Danish organisation to ensure that local partners and other recipients of grant funds do not appear on the EU's or the UN's terrorism lists.
- Screening must be carried out when partners are selected and must be checked against the EU's and the UN's terrorism lists.
- CISU has incorporated the Ministry of Foreign Affairs' anti-terror clause into all grant contracts between CISU and Danish organisations.
- It is a requirement that the clause is likewise included in all cooperation agreements between Danish organisations and their partners in programme countries. This is also described in CISU's administrative guidance for the funding schemes.
- CISU only disburses grant funds to the Danish grant holder, who is thereafter responsible for disbursement to local partners.

8.2 CISU's requirements and monitoring thereof

All grant holders receive, together with their contract, a grant letter setting out the requirement for ongoing monitoring and referring to CISU's monitoring tools. These tools include screening in relation to the anti-terror clause.

CISU always checks that all of the Ministry of Foreign Affairs' clauses – including the anti-terror clause – appear in the co-operation agreements, when monitoring is carried out with Danish organisations and their local partners.

CISU carries out active monitoring with a selection of grant holders, both in Denmark and among local partners. The monitoring includes, among other things:

- the use of monitoring checklists, which cover both financial monitoring and an assessment of organisations' compliance with their contract with CISU (accountability compliance)
- checking that cooperation agreements contain the anti-terror clause
- assessment of organisations' procedures for ensuring that they do not cooperate with parties who appear on the EU's or the UN's sanctions lists
- "spot checks", as well as assessment of local partners' financial systems and capacity
- obtaining documentation or reports from the Danish organisations' ongoing monitoring of their local partners

CISU uses its own checklists during monitoring and encourages Danish organisations (grant holders) to use the same checklists in their ongoing cooperation with partners. The checklists and other administrative resources can be found on CISU's website.

All monitoring visits are documented in a monitoring report.

8.3 CISU's anti-terror initiatives and capacity building

To support member organisations and grant holders in their anti-terror work, CISU has developed several resources:

Accountability Learning Site: contains a dedicated page on anti-terror, with good examples, standards and relevant links: [Anti-terror learning page](#)

Courses: CISU offers a range of courses that strengthen the capacity of Danish grant holders and partners for responsible management. Under the course category Organisation & Management, courses are offered on, among other things, management, financial management, project visits and accountability, including the use of checklists during monitoring. The current course overview can be found on [CISU's website](#).

8.4 CISU's anti-terror screening

CISU screens all contractual parties, partners, suppliers and other actors against the EU's and the UN's terrorism lists, which are updated on an ongoing basis:

- **EU sanctions list:** [Consolidated list of persons, groups and entities subject to EU financial sanctions](#)
- **UN sanctions list:** [UN Security Council Consolidated List](#)

