

2.13 Anti-corruption policy

Revised 20191204 (not on Board level)

# Background

The aim of this policy is to highlight and define the risks of corruption in the work of the Foundation Radiohjälpens (Radio Aid) work.

The field in which the Foundation Radiohjälpen works builds upon trust, which shall be mainstreamed in all parts of the organisation and its work. Any suspicion of fraudulent behaviour might undermine the high level of trust enjoyed by the organisation, and will, at all times, most severely affect the rights holders within funded projects. Hence, anti-corruption is a strategically important issue for the entire organisation, requiring strong internal control systems and guidelines that can help to detect, mitigate and prevent all forms of corruption and fraudulent behaviour.

# Definition of corruption

There are many definitions of corruption applied globally. The Foundation Radiohjälpen defines corruption as:[[1]](#footnote-1)

Abuse of trust, power or position for improper gain. Corruption includes, among other things, taking or giving of bribes – including bribery of a public official, fraud, embezzlement, breach of trust, extortion, conflict of interest and nepotism.

# Aim and target group of the policy

The objective of the policy is to clarify and counteract risks and other irregularities within the organisation, and to mainstream anti-corruption measures in all aspects of the Foundation Radiohjälpen’s work, including the projects it finances. . An anti-corruption policy is a cornerstone in such work and should be taken into consideration in the preparation, implementation and follow-up of the operations. Through a systematic anti-corruption work, the Foundation Radiohjälpen aims to facilitate and create awareness about preventive measures that obstruct the incidence of mistakes, reveal errors and enable apt actions to be taken. The policy shall be applied by board members, all employees, interns and hired consultants.

# The policy

Corruption and fraudulent behaviour are factors which strongly contribute to sustained poverty, degradation of the environment and weak management of resources. Ultimately, it is the rights holders constituting the very target group of the Foundation Radiohjälpen’s work who are most severely affected by corruption and the misuse of funds. To counteract the negative impacts of corruption and help contribute to a sustainable development and an effective management of resources, the Foundation Radiohjälpen has a zero-tolerance approach to corruption and fraudulent behaviour. The Foundation Radiohjälpen’s approach to combat corruption is to *always prevent, never accept, always inform and always act,* even in situations in which such action can lead to delays, impediments or a complete suspension of activities.

The Foundation Radiohjälpen shall immediately act to stop corruption when detected, and when applicable and relevant take legal action. National legislation and regulations must be respected in international projects but shall never serve as an excuse in support of corruption or unethical behaviour. The Foundation Radiohjälpen abides by Swedish legislation and regulations.

Corruption might occur in situations where there is a possibility to gain personal benefits. As corruption is difficult to detect and costly to investigate, preventive work is crucial. Awareness, effective internal control systems and routines coupled with clear guidelines are important measures that shall be used to prevent and detect corruption.

# Transparency, accountability and participation

The Foundation Radiohjälpen has as a fundamental norm to always prevent and never accept corruption, and to always act and inform in the event of suspected corruption. To combat corruption, the following core principles are important:

* Transparency – Maintaining a transparent organisation is very important to improve internal control and to strengthen trust towards employees, donors and partners as well as the people targeted by the organisation’s work.
* Accountability – To combat corruption, it is necessary that the persons responsible can be held accountable for their actions and decisions by the people/groups that have given them the trust to lead the organisation, and/or by legal authorities.
* Participation – The ability of partner organisations and their local partners on different levels to assert real ownership of and influence on all relevant processes of the funded projects is a precondition for combatting corruption.

# Area of application

The anti-corruption policy applies to members of the board, employees and interns at the Foundation Radiohjälpen as well as consultants and other people working for the Foundation Radiohjälpen, including persons who accompany or in any way represent the Foundation Radiohjälpen during visits to funded projects and partner organisations.

All employees have a responsibility to actively prevent corruption through identifying and adapting to potential risks in all activities, and to always react and report suspicion of corruption or irregularities.

## International operations and projects

The Foundation Radiohjälpen to a large extent works in cooperation with partner organisations in which the issue of corruption constitutes a crucial part of the . Partner organisations in the international projects funded by the Foundation Radiohjälpen must have a clear strategy and internal control systems for addressing-corruption and irregularities.

The assessment of a new or current partner organisation in the international projects shall comprehend a consideration of the organisation’s internal control systems, including routines for combatting corruption and fraudulent behaviour also in subsequent steps.

If a partner organisation, directly or indirectly, avoids to apply internal control systems l to fight corruption and fraudulent behaviour, it could serve as a reason not to approve economic funding.

## National operations and projects

The anti-corruption policy of the Foundation Radiohjälpen also applies to the national operations. Approved funds from the Foundation Radiohjälpen shall only be used according to what is stipulated in the application and in the approval letter. The members of the Board of the applying organisation are responsible to ensure that this is done.

When assessing an application, the Foundation Radiohjälpen among other things reviews how the applying organisation has fulfilled their previous obligations. If the organisation is applying for the first time, several internal documents must be submitted to enable the Foundation Radiohjälpen to conduct an assessment of the organisation’s internal capacity to follow the rules and regulations of the Foundation Radiohjälpen.

Commitments

Employees andmembers of the Board as well as partner organisations (including third parties receiving transferred funds from partner organisations) have the responsibility to, without delay, act upon any suspicion of corruption, as well as to immediately report suspicion of corruption to the Foundation Radiohjälpen in accordance with this policy, the Foundation Radiohjälpen’s guidelines for suspected corruption and the Foundations Radiohjälpen’s checklist for suspected corruption in international projects.

* This policy shall be reflected in all agreements entered into between the Foundation Radiohjälpen and partner organisations, and shall be forwarded by partner organisations to third parties such as implementing partners both in Sweden and abroad.
* This policy shall be applied in all of the Foundation Radiohjälpen’s procurement processes.
* Employees and members of the Board cannot participate in or prepare decisions where their impartiality may be questioned (conflict of interest), and are obliged to report any such conflict of interest to the Secretary General or Chairperson of the Board.
* Employees and members of the Board cannot make financial or other commitments on behalf of the Foundation Radiohjälpen outside of their mandate or authorization.
* Employees and members of the Board cannot receive gifts from colleagues, partner organisations or other individuals or groups, unless the gift is of a insignificant value.

To prevent corruption the Foundation Radiohjälpen shall, internally as well as in relation to partner organisations:

* Support democratic processes based on transparency, accountability and participation.
* Assess corruption risks in all projects and activities.
* Manage, monitor and follow up on identified risks.
* Assess and strengthen good management and internal control systems.

# Responsibility

The main responsibility for the preventive work against corruption and fraudulent behaviour as well as to investigate and report suspected “external” corruption to the Board lies with the Secretary General of the Foundation Radiohjälpen. The economist and – when necessary – national or international project manager of the Foundation Radiohjälpen also constitute part of the group investigating external corruption cases. The main responsibility to investigate suspected “internal” corruption primarily lies with a specific investigation group appointed by the Board, consisting of three members of the Board (currently the chairperson, vice chairperson and a member of the Board from SVT). If suspicion of corruption concerns one of the two latter, they shall be excluded from the investigation group. If suspicion of corruption concerns the chairperson or the entire Board, the issue shall be managed by the chairperson of SVT and the General Secretary of the Foundation Radiohjälpen.

A checklist for suspected corruption in international projects is formulated in a separate document.

# Areas of risk

## Examples of external risks

* War and conflict zones.
* Development projects in countries with a high level of corruption.
* Poorly developed democracies and deficient transparency.
* Low levels of and unevenly distributed economic growth.
* Poorly developed civil societies and deficient medial coverage.
* In procurements of goods or services.

## Examples of internal risks

* Extensive management of cash within an organisation or a project.
* When the contribution from the Foundation Radiohjälpen constitutes a large share of the local organisation’s economy.
* Close ties of friendship between colleagues and/or representatives for the parties in the agreement.
* That control of compliance to regulation and documentation to an excessive extent is replaced by trust in co-workers.
* Deficiencies in internal routines, policies and regulations.

## Warning signals

Corruption is usually detected when someone reacts to warning signals.

Examples of warning signals:

* Lack of transparency in the organisation or project.
* Unclear or deficient structures for appointment of responsibilities and accountability in the organisation or project.
* A very dominant and charismatic leader for the organisation or project.
* That power is concentrated to one or a few persons in the organisation.
* Project budgets are unclear and difficult to connect to planned activities.
* Reports are late and unclear/incomplete.
* False certificates of accountants, deviant responses in attestation reports and management letters.
* Deficient competency of the person responsible for the economy.
* Questions are answered in a deviant manner.
* Rumours and tips regarding flaws/irregularities stem from different, mutually independent sources.
* Unusual or defectively documented payments/receipts.
* Purchases have not been registered through the usual procurement procedures.
* Unreasonably high remunerations allocated to consultants.
* Regular use of the same consultants.
* Deficient time sheets and absence reports.
* Travel grants are approved on unclear bases.

# Guidelines for suspected corruption of fraudulent behaviour

## Commitment to report

Suspicion of corruption or irregularities in operations and projects funded by the Foundation Radiohjälpen shall always be reported according to the paragraph on Commitments above.

The Foundation Radiohjälpen has adopted a so-called whistle-blowing system for anonymous reports. More information about this can be found on the Foundation Radiohjälpens website.

Whistle-blowing reports are supervised by an external, independent company that assesses whether the matter is external or internal in character, according to which it is subsequently transferred to the person(s) responsible for further investigation. See chapter Responsibility.

A rapporteur has the right to receive feedback as to how the reported case is being managed, as long as it is possible given feasible secrecy precautions.

Avoiding to report a suspected case of corruption can result in legal or disciplinary actions. The risk of losing financial support is not an excuse to avoid reporting.

## Management of reported suspicion

## Investigation

Consideration of circumstances and the current situation is always necessary. When strong and well-grounded suspicions are confirmed, a report to the police shall be submitted.

## Communication

The Foundation Radiohjälpen has as a principle to be cautious during on-going investigations, to avoid the coming to harm of any person involved in the process, including both informants and suspects as well as others.

## Actions

Regardless of how a suspected case of corruption emerges, it is important to act immediately. In all cases, an action plan shall be worked out to manage irregularities and deficiencies, and to strengthen internal routines. The investigation group is responsible to document decisions and actions in relation to the process to manage suspicion of corruption. The Foundation Radiohjälpen’s Checklist for suspected corruption in international projects shall be used by the investigation group as a basis for decisions regarding additional actions such as special audits, evaluations, follow-up visits or other forms of investigation. The investigation group also decides whether to conduct a report to the police.

Concerned organisations shall be given the opportunity to explain the emerged situation.

It is important to protect evidence such as bookkeeping and accounting materials, reports and other things that might be necessitated. It can also prove necessary to suspend an employee from their service or from access to certain information. Inquiries with the suspect shall be held as soon as possible to protect assets or evidence, and to avoid anyone’s reputation coming to harm.

Investigations shall be conducted professionally, and meetings and interviews shall be held with a clear mandate and be apprehended as impartial. They shall have a clear and specific purpose so that explicit conclusions can be made and reported.

## Prosecution

In case of a suspected crime, the main rule is that it shall be reported to local law enforcement for investigation. The investigation group shall appoint persons responsible for contact with the police and for the qualified documentation and registration of all activities. Crimes committed outside of Sweden can in some cases be investigated in Sweden, but investigation measures in other countries may require cooperation with national police. Since police investigations can take a long time, the Foundation Radiohjälpen shall when necessary also take proper actions such as complementary investigations through an accountant.

## Sanctions

The Foundation Radiohjälpen applies sanctions against employees in accordance with Swedish legislation and/or with respect for labour legislation or other legislation in partner countries. Concerned organisations are responsible for sanctions against their employees and agreement partners in subsequent steps.

Examples of sanctions are:

**Warning**: for less serious incidents, a repetition of current regulation and a warning can constitute adequate sanctions. In the incidence of repeated offences, other sanctions can become relevant.

**Dismissal**: If an employee at the Foundation Radiohjälpen is found guilty of corruption, embezzlement or bribery, they are dismissed from their position.

**Reparation**: An employee can be obliged to repay the full amount of the damage done by a confirmed embezzlement. Contracts can be terminated due to contractual breach, which can lead to repayment obligations.

## **Repayment of funds:** Contracts with cooperation organisations state that the Foundation Radiohjälpen can demand repayments of contributions which have not been used according to the agreement.

## Follow-up and reporting

### Annual summary

The Secretary General of the Foundation Radiohjälpen is responsible for submitting an annual report on corruption and irregularities to the Board, to summarize experiences and lessons learned regarding the preventive and investigative measures taken in relation to corruption. The Secretary General and the Board of the Foundation Radiohjälpen shall take relevant actions to include these experiences in planning the organisation’s operational work.

This policy and its guidelines were adopted by the Board of the Foundation Radiohjälpen at the Board meeting on November 13th, 2017 and shall be updated yearly.

1. The definition is based on the Swedish International Development Cooperation Agency’s (Sida) definition, however adjusted to include the work the Foundation Radiohjälpen conducts and funds in Sweden as well [↑](#footnote-ref-1)