

ANTI-CORRUPTION POLICY

This document should be read in conjunction with:

- Civil Rights Defenders Procurement Guidelines
- Civil Rights Defenders Delegation of Authority
- Civil Rights Defenders Audit Instructions for Partners
- Civil Rights Defenders Instruments of Financial Control and Routines
- Civil Rights Defenders Code of Conduct
- Civil Rights Defenders Whistleblower Policy

Civil Rights Defenders has zero tolerance for corruption. The organisation will avoid conflicts of interest in all its work and undertakings. These principles underpin the Policy on Anti-Corruption.

Transparency International defines corruption as “abuse of entrusted power for personal gain”. Corruption includes bribery, corruption, extortion, embezzlement, conflict of interest, favouritism, and nepotism, thus can be both financial and non-financial in nature.

The risk for corruption increases where government and institutions are weak, and where human rights and fundamental freedoms are not respected. If the ability for people to express grievances, challenge decisions or participate in public life is restricted and where conflicts of interest are not avoided, corruption has freer reign.

Corruption undermines the respect for and protection of human rights. As such, corruption runs counter to the core of our work – to defend people’s civil and political rights, and to support and empower human rights defenders at risk. Therefore, we work to combat corruption directly and indirectly.

This anti-corruption policy applies to all Civil Rights Defenders staff, board members and volunteers in all countries where Civil Rights Defenders work. It also applies to consultants and any other party representing Civil Rights Defenders.

Anti-corruption forms an integral part of our work and takes place:

1. Through our **internal control systems**, which strive to ensure our resources are used effectively, fairly and with transparency;
2. Through the **active use of the anti-corruption policy** among staff, board members and volunteers.
3. Through anti-corruption initiatives carried out together with partners. Such initiatives include campaigning and awareness raising against corruption; efforts to strengthen public accountability and monitoring and documenting corruption.

This anti-corruption policy encompasses the first two levels.

1. INTERNAL CONTROL SYSTEMS

Civil Rights Defenders has an internal Working Group against Corruption (WGC), which assume overall responsibility of anti-corruption efforts, including refining tools and receiving complaints.

The WGC consists of one Board member, one Department Director and the Chief Financial Officer. The Board and the PDs elect one representative each to the WGC for a one-year period. The WGC decides who is chairing the WGC.

The WGC reassess this policy and any required regulations linked hereto at least every two years, in order to ensure it remains useful, relevant and effective.

Prevention

Our policies and guidelines for internal systems and controls are underpinned by zero tolerance for corruption.

The WGC will ensure that the zero tolerance is explicit and that all relevant documents otherwise comply with this policy, including the following:

- Civil Rights Defenders Procurement Guidelines
- Civil Rights Defenders Delegation of Authority
- Civil Rights Defenders Audit Instructions for partners
- Civil Rights Defenders Internal audit instructions
- Civil Rights Defenders Instruments of financial control and routines
- Civil Rights Defenders Code of Conduct
- Civil Rights Defenders Handbook of Employment
- Grant Contract
- Civil Rights Defenders Grant Management routines
- Job descriptions

In all our work we follow the principle of four eyes. This means that all decisions or evaluations involve at least two staff members. This principle helps us to ensure that our decision making is based on facts and objective evidence of goal fulfilment, rather than prestige and personal opinion.

Financial support to third parties constitutes an elevated level of risk of corruption. Mindful of this, Civil Rights Defenders has an anti-corruption element in our organisational assessment tool that we use to identify and manage risk of corruption of partners.

All staff members at Civil Rights Defenders are required to ask their respective supervisor for approval of side duties that may constitute a conflict of interest, or that may be perceived as constituting a conflict of interest. All line managers are responsible for ensuring that their staff members are informed about this requirement. In case of disagreement between a staff member and his/her manager about what may constitute a conflict of interest, the matter should be referred to the WGC. (For additional detail on Conflict of Interest, see Civil Rights Defenders Code of Conduct regarding Additional Assignments.)

Monitoring

Civil Rights Defenders monitors the work of our partners and their project cycles. Our Results Based Management system provides systematic guidelines in terms of looking at a new project, planning and implementing projects, evaluations and adjustments, and assessment of partner development. The work is done by Programme Officers with the support of their Department Director. With its rigorous control and reporting requirements, the system reduces the opportunity for corrupt practices by partners and staff members.

External auditors: Civil Rights Defenders requires that partners conduct independent audits as part of their reporting to us, the reports of which require our approval. Unless otherwise stated, such audits are annual, and auditors must be accredited according to international standards.

We also initiate organisational audits, encompassing financial controls and the capacity of the partner organisation to manage projects. We use a pool of external auditors for this purpose. A web-based whistle blower mechanism allows for anonymous reports, including on corruption allegations relating to Civil Rights Defenders and our partner organisations.

Action

All staff must ALWAYS act when suspicions emerge. All staff must feel safe and welcome to report allegations of corruption to his/her supervisor or to anyone in the WGC. The web-based whistle blowing mechanism for complaints is a central tool.

In our dialogue with partners, we should welcome reports of alleged corruption to the responsible Programme Officer, Department Director or WGC. Partner representatives too must be guaranteed anonymity and informed about the whistle blowing mechanism.

When there is a warning sign or allegations of corrupt practices, WGC makes initial mapping to assess the substance of the allegations.

If allegations are made by a bona fide source or can otherwise be substantiated or in part verified, WGC opens a case and launches an initial investigation. The WGC informs the Executive Director or, if s/he is implicated, the Chair of the Board of the complaint and advises on the course of action. The need to hire an external auditor for such an investigation should be considered and the scope of the investigation.

If WGC considers the allegations as strong, the Executive Director/Chairperson will make a complaint to the police; freeze any related support; initiate processes for recovery; terminate the partnership agreement / contract. The WGC will be responsible for initiating these steps together with the relevant Department Director.

Should a Civil Rights Defenders staff member be implicated, the WGC may start an initial investigation without informing the staff member allegedly involved. If the WGC considers the allegations against the staff member as strong, the case will be referred to the relevant authorities. Pending investigation, the staff member will be separated from tasks and duties that relate to the case.

If allegations against a staff member are verified, disciplinary measures will ensue, ranging from temporary separation from duties, demotion to dismissal, depending on the severity of the corrupt practices. The WGC will advise the Executive Director, who will decide on disciplinary measures.

2. ACTIVE USE OF THE POLICY

Training/induction

Civil Rights Defenders staff members will go through this policy with their supervisor.

All staff members shall with partners explicitly highlight contractual anti-corruption obligations through contracts.

Chain of responsibility

All staff members must report suspected corruption to the WGC or their immediate supervisor.

Department Directors are responsible for the work on their respective departments. They need to ensure that staff members have knowledge and resources to meet the requirements under this policy.

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