

ANTI-CORRUPTION POLICY

This document should be read in conjunction with all Civil Rights Defenders' relevant documents and policies including the Whistleblower Policy and the Complaints Policy.

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

Transparency International defines corruption as “abuse of entrusted power for personal gain”. Corruption includes bribery, corruption, extortion, embezzlement, conflict of interest, favouritism, nepotism, as well as sexual exploitation, abuse and harassment, and 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 Civil Rights Defenders' work – to defend people's civil and political rights, and to support and empower human rights defenders at risk. Therefore, Civil Rights Defenders works to combat corruption directly and indirectly.

This Anti-Corruption Policy applies to all Civil Rights Defenders staff, board members and partners in all countries where Civil Rights Defenders works. It also applies to consultants, interns and any other party working with or representing Civil Rights Defenders.

Anti-corruption forms an integral part of Civil Rights Defenders' work and takes place:

1. Through Civil Rights Defenders' **internal control systems**, which strive to ensure resources are used effectively, fairly and with transparency.
2. Through the **active use of the Anti-Corruption Policy** among staff, board members, consultants and interns.
3. Through **anti-corruption efforts together with partners**, including monitoring, documenting, and acting upon corruption.

This Anti-Corruption Policy encompasses the first two levels. The third point is regulated by actively implementing Grants Contracts with partners.

1. INTERNAL CONTROL SYSTEMS

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

The AWG consists of one Board member, at least one Department Director (DD) and the Chief Financial Officer. The Board and the DDs elect one representative each to the AWG for a one-year period. The AWG decides who is chairing the AWG.

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

Prevention

Civil Rights Defenders' policies and guidelines for internal systems and controls are underpinned by zero tolerance for corruption.

The AWG will ensure that the zero tolerance is explicit and that all relevant documents comply with this policy, including the Whistleblower Policy and the Complaints Policy as well as other relevant Civil Rights Defenders documents and policies.

In all Civil Rights Defenders' work the principle of four eyes is followed. This means that all decisions or evaluations involve at least two staff members. This principle helps ensure that Civil Rights Defenders' 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 risk of corruption. Mindful of this, Civil Rights Defenders has a section on anti-corruption in its assessment of partner capacity tool used 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 their manager about what may constitute a conflict of interest, the matter should be referred to the AWG. (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 its partners and their project cycles. Civil Rights Defenders' Grant Management Routines provide routines for managing sub-grants to partners. The work is done by Programme Officers with the support of their Department Director. With its rigorous control and reporting requirements, the routines reduce 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, the reports of which require Civil Rights Defenders' approval. Unless otherwise stated, such audits are annual, and auditors must be accredited according to international standards.

Civil Rights Defenders also initiates organisational audits, encompassing financial controls and the capacity of the partner organisation to manage projects. Civil Rights Defenders uses a pool of external auditors for this purpose. A web-based Whistleblower mechanism allows for anonymous reports, including on corruption allegations relating to Civil Rights Defenders and partner organisations. Civil Rights Defenders' Whistleblower Policy and reporting mechanism are located on its website.

Action

All Civil Rights Defenders' staff, partners and service providers must always act when suspicions emerge. All staff must feel safe and welcome to report allegations of corruption to

their manager, or if there is suspicion that the supervisor is involved, directly to the AWG. The *template for reporting suspicions of corruption* should be used. Where needed, Civil Rights Defenders' web-based Whistleblower mechanism for complaints can be used as a central tool.

In dialogue with partners, reports of alleged corruption will be made to the responsible Programme Officer, Department Director or AWG. Partner representatives too must be guaranteed anonymity and be informed about the Whistleblower mechanism.

When there is a warning sign or allegations of corrupt practices, AWG shall assess the substance of the allegations.

If allegations are made by a bona fide source or can otherwise be substantiated or in part verified, AWG opens a case and launches an initial investigation. The AWG informs the Executive Director or, if they are 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.

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

Should a Civil Rights Defenders staff member be implicated, the AWG may start an initial investigation without informing the staff member. If the AWG 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 AWG will advise the Executive Director, who will decide on disciplinary measures.

Civil Rights Defenders shall document suspicions when they emerge, and document the investigation, actions, outcome, and lessons learned. How to document the management steps is included in Civil Rights Defenders' *template for reporting suspicions of corruption*.

Civil Rights Defenders shall inform the related donor when substantiated cases occur, as necessary. The AWG shall decide how to best report to the respective donor, in line with donor requirements.

2. ACTIVE USE OF THE POLICY

Training/Induction

Civil Rights Defenders Department Directors are responsible for going through this policy with their staff as part of the onboarding process for new staff.

All staff members working with grants to partners shall explicitly inform partners about relevant contractual anti-corruption obligations.



Anti-corruption training is mandatory for all Civil Rights Defenders staff on a biannual basis.

Chain of Responsibility

All staff members must report cases of suspected corruption to their immediate manager, or if there is suspicion that the supervisor is involved, directly to the AWG.

Department Directors are responsible for anti-corruption work within their respective departments and for reporting suspected corruption to the AWG using the *template for reporting suspicions of corruption*. Department Directors need to ensure that staff members have knowledge and resources to meet the requirements under this policy.