FORUMCIV.

Anti-corruption Policy

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Definition

ForumCiv defines corruption as an abuse of trust, power or position for improper gain benefiting a person, organisation, company or other.

Corruption can be financial or non-financial and include behaviours such as the offering and receiving of bribes (including the bribery of foreign officials), extortion, conflicts of interest, various forms of fraud (e.g. falsification of documents, financial fraud, procurement fraud). It also includes favouritism, bias, deception, embezzlement, forgery, facilitation payments, wasteful use of resources and nepotism.

In alignment with the Rights Based Approach (RBA), corruption is recognized as a violation of human rights that disproportionately affects marginalized rights holders by limiting their access to resources, justice and participation.

Corruption may also include the abuse of power that contribute to gender-based violence and Sexual Exploitation, Abuse, and Harassment (SEAH), where individuals misuse their position to exploit or harm others. It can further reinforce other forms of discrimination, exacerbate environmental exploitation and escalate conflicts.

ForumCiv's approach

ForumCiv's approach towards corruption is to always prevent, never accept, always inform, and always act even when this may hinder operations. ForumCiv applies a systematic anti-corruption approach based on the following guiding principles:

- Transparency – Through insight into the activities control is strengthened and confidence created towards employees, donors and partners as well as to the people for whom the activities are for;
- Accountability – To be able to fight corruption, it is necessary that responsible individuals can be held accountable for their acts by people/groups by whom they have been given the confidence to conduct the work or through legal bodies;
- Non-discrimination – Abuse of power is one of the key elements to perpetuate discrimination, thus it becomes crucial to consider non-discrimination as a basis for anti- corruption work;
- Non-discrimination – Abuse of power, including SEAH, perpetuates discrimination and exploitation, requiring that anti-corruption efforts also address these abuses.
- Participation – To be able to fight corruption in practice civil society organizations need to have real ownership and influence on different levels over all relevant processes within the programmes and projects;
- Zero tolerance – ForumCiv stands for a zero-tolerance approach to corruption in all its forms and do not tolerate any form of corruption in relation to its operations. Both the organization itself and all staff have a duty to report immediately all suspicion of corruption. All suspected cases of corruption are assessed, investigated, and disciplinary measures are taken in all such cases as appropriate, in a professional, transparent and fair manner.

Commitment

- This policy shall be applied in all procurements, including procurements made by partners and any partners at subsequent levels;
- Partners and any partners at subsequent levels as well as employees, interns, trainees and Board Members and contracted consultants are required to act upon any suspected cases of corruption and to inform ForumCiv in accordance to this policy;

- Managers shall ensure that this policy and related guidelines on suspected corruption is known and applied by all employees, contracted consultants, interns and trainees;
- Managers shall ensure that documented routines, forms and agreements that help in the prevention of corruption are known and used within the organization;
- Managers shall ensure that there are clear routines and systems to deal with suspected cases of corruption;
- All employees, contracted consultants, interns, trainees, and partners are required to act upon any suspected cases of corruption or SEAH and inform ForumCiv in accordance with this policy.
- Employees, contracted consultants, interns, trainees and Board Members may not participate in decisions nor prepare decisions in cases where his/her impartiality can be questioned;
- Employees, interns and trainees are required to inform their superior of any circumstances where their impartiality may be questioned. Board Members and contracted consultants have an obligation to announce themselves biased in relevant situations;
- Employees, interns, trainees and Board Members may not commit the organization, financially or otherwise, outside their delegated authorization;
- Employees, interns, trainees, Board Members, partners and contracted consultants may not accept gifts from colleagues, partners or other individuals or groups, unless the gift is of insignificant value.

Preventive routines

ForumCiv has a system for internal control with a clear connection between responsibility and authorization documented in delegation of authority in order to ensure that funds are only disbursed in accordance with the relevant agreement. ForumCiv also conducts organisational assessments of partner and risk analysis of all project/programme application to proactively identify weaknesses and suggest measures of mitigation or strengthen the partners' capacity for financial and operational management as well as internal control. In agreements with partners, be clear about which regulations apply and what the consequences will be if these regulations are breached.

Planned and unplanned spot check meetings are also held with staff to update information or exchange experiences on routines and methods for quality assurance. ForumCiv is dedicated to continuous improvement and learning from past deviations and use lessons learnt in the Organisational Learning cycle for this purpose. ForumCiv, ForumCiv's partners and partners at subsequent step shall:

- Support democratic processes built on transparency, accountability and participation;
- Assess corruption risks in all projects, programmes and activities. Identified risks should be appropriately addressed and followed up;
- Strengthen good governance and internal control both internally and in partner organisations.
- Incorporating SEAH in the internal control mechanisms, risk assessments, and organizational assessments will ensure it is systematically monitored.

Whistleblowing service

ForumCiv has an established whistleblower system that makes it possible to report allegations of corruption anonymously, both from own staff and from people outside the organisation. A whistleblowing service provides all employees with a means of reporting suspicions of internal corruption or other serious misconduct among staff. Reporting suspected corruption is mandatory, and a whistleblower is always protected from sanctions. The whistleblowing service also covers cases of SEAH, and whistleblowers reporting such cases are protected from sanctions.

Roles and responsibilities

All reported cases in accordance to this policy are investigated. The Secretary General is responsible for investigating all suspected cases of corruption and SEAH, reporting to the Board and donors when applicable. Secretary General has delegated that responsibility according to ForumCiv's Guidelines for deviations and suspected corruption and other relevant governing documents for operational areas.