

ANTI-CORRUPTION POLICY

Approved by: The Board of Afrikagrupperna

Adoption date: September 2023

Responsible: Secretary General

This Policy forms the basis of Afrikagrupperna's work against corruption. It clarifies how Afrikagrupperna defines corruption and how it affects our development cooperation work. It also describes our basic principles on how to combat corruption, both in general and within organisations. The Policy applies to staff, members of the Board and other representatives of the organisation. The Policy is also annexed to all our agreements with partner organisations.

Afrikagrupperna's definition of corruption:

Abuse of trust, power and position for improper gain

Common forms of corruption and other irregularities include, but are not limited to:

- **Favouritism/nepotism/conflict of interest:** Unfair favouring of a person or group at the expense of others.
- **Bribery:** When someone improperly provides goods or services in return for some form of improper compensation.
- **Sharing of profits:** Such as kickbacks, cuts, etc.
- **Diversion of resources for private gain:** Includes fraud, embezzlement and theft of resources for own use etc.
- **Misuse of power and/or position:** To use entrusted power and/or position for personal gain. For example money, services etc. in exchange for food, shelter etc.

- **Sextortion:** To use entrusted power for sexual favours – for example in exchange for food, medical help etc.
- **Failure to take action:** For example failure to report to management/donor or police when suspicions arise.

Obligations to report

Management, staff members, staff members of partner organisations and others involved are obliged to report any suspected cases of corruption and other irregularities to Afrikagrupperna's management immediately. This applies to both partner organisations and Afrikagrupperna as an organisation. There is also a whistleblowing service on the Afrikagrupperna website which can be used.

Failure to report suspicion may lead to legal action or other disciplinary measures. Fear of losing public or financial support will never be accepted as an excuse for failure to report. All illegal actions must be reported to the police by the organisation in which it occurs, which is also stated in the Partner Agreement. However, Afrikagrupperna should consider the risk of violations against human rights in relation to reporting to the police and have this dialogue with the partner organisation in question.

Decisions on how to handle suspected cases of corruption and other irregularities among partner organisations will normally be taken by the International Programme Manager at Head Office in Stockholm. There is a guideline to assist staff on how to be aware of warning signals and how to act when irregularities and corruption are found. Afrikagrupperna reserves the right to withdraw support or deny funding to partner organisations when there are strong indications of corruption or fraud, even if these cannot be proven or when there is no conviction in a court of law.

Corruption – a challenge to development

All national legislation considers corruption illegal but there are considerable variations in how legal systems define and address corrupt behaviour. What to some may appear to be illicit or illegal practices might be seen by others as acceptable, both legally and culturally.

Petty corruption encourages and lays the basis for large-scale corruption and vice versa. It is therefore not possible to distinguish between practices that may be generally accepted or expected, and those that may be considered to be 'more serious'. Local legislation, rules and regulations must be respected, but never used as an excuse for supporting corruption or other unethical behaviour. Afrikagrupperna is subject to Swedish legislation and regulations independent of where and with whom the organisation is working.

Corruption poses a serious challenge to development. It undermines democracy and good governance by subverting formal processes. It weakens economic development by generating distortions and inefficiency. Corruption increases the vulnerability of women and men living in poverty and is denying them free and fair access to services that all people are entitled to.

All organisations involved in development cooperation are at risk of being affected by, exposed to and participating in corruption. Corruption challenges the objectives of Afrikagrupperna's development work as well as the most fundamental values on which our organisation is built.

Afrikagrupperna's support of partner organisations contributes to strengthening civil society in general. Through our support, we work against corruption on an overall societal level, as strong civil society organisations have an important role to play in curbing corruption. By acting as watchdogs of corporations, politicians and other decision makers, civil society organisations can strengthen transparency in society, and increase the degree of accountability. Civil society organisations can also reduce corruption by strengthening people's influence in decision-making processes as well as contributing to increased awareness, expectations and behavioural changes towards a democratic culture and democratic values of citizens and society at large. Afrikagrupperna considers this work to be very important and it is also part of goal 16 of the UN Agenda 2030.

Afrikagrupperna's basic principles to combat corruption

1. **Awareness** - In order to combat corruption and other irregularities, it is essential that Afrikagrupperna and staff/board/governing structures at partner organisations are aware of our anti-corruption policy. The aim is to create a proactive attitude in the identification and mitigation of risks. Although this policy against corruption and other irregularities is global and absolute, the training and engagement of all involved must be adapted to the local context.
2. **Transparency** - Transparency is crucial in tackling corruption. The partnership between Afrikagrupperna and the organisations it works with should be characterised by transparency. Existing statutes, policies, strategies, plans, decisions, reports and financial and governance issues must be transparent for staff and others. This will increase confidence among employees, donors and members as well as among the public in general.

An important part of transparency is to have a close but professional relationship with partner organisations. This will mitigate the risks and ensure quality in our development work. Efficient monitoring is essential to combat corruption.

3. **Accountability** - Responsible persons/organisations must be held accountable to the bodies that entrust them to manage operations and funds.

To ensure accountability, Afrikagrupperna as well as organisations that Afrikagrupperna supports, must have proper oversight structures with clear lines of accountability.

Clear, well-documented decision-making structures are essential and this also applies to administrative structures that share the tasks concerning responsibility and control in different posts. These are key elements for operational accountability.

4. **Competence** - Afrikagrupperna and partner organisations must have adequate systems for financial and internal controls, and staff who are sufficiently competent to be able to comply and work with the systems in place. Afrikagrupperna must make sure systems are in place before a contract with a partner organisation is signed.

Systems for financial administration and internal control are not fixed, but developed over time based on experience. We must therefore ensure that any lessons learned through experience are communicated across the organisation and incorporated into professional functions.

Afrikagrupperna must provide opportunities and platforms for ourselves and our partner organisations to discuss all these matters. In this way we will increase awareness, transparency, accountability and competence. It is important that this is done in partnership, so that everyone involved is aware of any difficulties and can find ways of handling them.

Development of anti-corruption work

Boards, governing and oversight structures and management have the ultimate responsibility for assuring and developing tools and procedures for internal controls in order to combat corruption. In practice, prevention of corruption is the responsibility of all involved in development cooperation financed by Afrikagrupperna and should thus be embedded in the performance of day-to-day activities. Other documents that Afrikagrupperna have in order to combat corruption are Guideline on how to handle cases of irregularities, Afrikagrupperna's Purchase and Procurement Policy, Order of Delegation, Internal Management and Control Questionnaire. Afrikagrupperna's Anti-corruption Policy is annexed to the Agreement with our partner organisations.

Specific responsibility for the implementation and development of this policy and monitoring the work against corruption lies with the Secretary General.

This policy refers to:

- Guideline on how to handle cases of irregularities
- Purchase and Procurement Policy
- Internal Management and Control Questionnaire
- Agreement with our partner organisations
- Order of Delegation