

Asian-Pacific Resource and Research Centre for Women (ARROW)

Anti-Corruption Policy

1. Introduction

The purpose of the Anti-Corruption Policy is to support ethics of work which are characterized by a high personal and organisational integrity, both internally and in relation to partners and donors. ARROW receives funding from many different sources and donors, and we have a responsibility to administer this funding in a responsible manner. The regulations of ARROW make clear demands to prevent and fight corruption, and we will fulfil this responsibility by promoting transparency and democratic control within our own organisation and our partner organisations.

The anti-corruption policy applies to all staff, the Board of Directors of ARROW, the Programme Advisory Committee (PAC) of ARROW, and the ARROW partners. Everyone mentioned above is required to follow this anti-corruption policy, and any infringement of this policy will be treated in accordance with the rules for follow-up and reporting described in this document.

Corruption is a threat against good governance, sustainable development, democratic processes and good business practice and contributes to social inequality. ARROW is at all times responsible towards our donors, cooperating partners and target groups, and prevention of corruption is crucial for the development results that we wish to achieve in our work.

ARROW works in developing countries in complex contexts with various languages and cultures and recognises that we and our partners must be able to carry out our work within these differences. This makes big demands on all to maintain and promote a high ethical standard and responsible behaviour built on knowledge, respect and common sense. We also follow the national legislation where we work and observe the rules and regulations of international law.

2. Definitions

Corruption is defined as ***the abuse of entrusted power for private gain*** by the Transparency International¹, the global civil society organisation leading the fight against corruption. Corruption can be exemplified as bribery, fraud, embezzlement and extortion.

3. Principles

3.1 Conflict of Interest

We will avoid any inexpedient conflicts of interest – real or potential – between personal interest, interest of ARROW, and the interest of our partners.

Avoiding conflict of interest is the overall principle in fighting corruption. ARROW's Conflict of Interest policy stated that it is to ensure that the deliberations and decisions of all members of Board and staff of ARROW are made in the interests of the women for whom ARROW advocates, and to protect the interests of ARROW when it is contemplating entering into a transaction, contract or arrangement that might benefit the private interest of the members of the Staff. A member of the Board and staff may not use her position in ARROW or confidential

¹ <http://www.transparency.org>

information obtained by her relating to ARROW in order to achieve a financial or non-financial benefit for herself or for a third party, including family or another non-profit organization, in such a way that is to the detriment of ARROW. ARROW is committed to maximizing appropriate transparency in its decision-making processes and documentation.

3.2 Abuse of Power and Extortion

We will not seek to influence any person or institution for private purpose by using our official position or offering them personal advantages. Likewise, we will not use ARROW's property, facilities, services and financial resources for private purposes except when permission is given. We will not use any forms of extortion as a method to gain advantages.

All parties identified in this anti-corruption policy should not use their professional status in ARROW or in a partner organisation for private gain. An example could be abusing good relations to suppliers to gain reduced prices for own advantage (e.g. computers, cars, food, consultant support or traveling for private use, etc.). One is not allowed to abuse her/his power as a manager to get personal favors or services done by employees.

3.3 Bribery

Bribery is defined as the act of offering someone money, services or other valuables, in order to persuade him or her to do something in return.

Bribery is illegal in all countries and harms the opportunities for fair and transparent relations of cooperation and the foundation for a democratic society. One example is that we do not receive bribes from potential partners or suppliers to make contracts with them and we do not give bribes to our partners as a way of influencing. Likewise, ARROW in under no circumstances accepts bribery in order to promote the implementation of activities. We base our cooperation with partner organisations on mutual ownership, accountability, participation, equality, harmonisation, and alignment.

3.4 Fraud and Embezzlement

Fraud and embezzlement are illegal and must not be used as methods to gain personal or professional advantages or property in relation to ARROW, partner organisations or any other stakeholders.

Fraud is defined as economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian. Examples of fraud and embezzlement are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, or misusing funds entrusted to us.

ARROW's and the donors' rules for accounting/financial guidelines shall therefore be applied to at all times. All involved parties are expected to show honesty and not to abuse their positions for own gain.

3.5 Nepotism and favoritism

We will not favor friends, family or other personal relations in recruitment, procurement, aid delivery or other situations.

Nepotism is favoritism toward relatives and friends. For instance, offering friends or family members a contract, despite the fact that there are others who are better qualified and willing to perform the job, or offering higher earnings and other benefits to employees who have a personal relation to the management. To avoid favoritism and nepotism in procurement we follow ARROW's Conflict of Interest policy. In recruitment at ARROW, the transparent recruitment procedures are followed in order to identify the best candidate. It is important to underline that if conflicts of interests are handled, it can in some cases be acceptable to hire/collaborate with family or friends.

3.6 Gifts

We will not give or receive, directly or indirectly, any gift or other favor that may influence the exercise of our function, performance of duty or other ways of possibly harming ARROW.

Gifts are defined as but not limited to: Services, travel, entertainment, material things or favors. In order to respect local traditions and conventional hospitality minor gifts are accepted. The value of an acceptable gift varies in different countries. Cash gifts are never accepted. All staff of ARROW and our partners are expected to show good judgment and when in doubt, contact their superior. A rule of thumb is that a gift should never influence your independent judgment and that one should share the gifts with colleagues, if possible.

4. Procedures

- 4.1 ARROW will take a stand on those cases of conflict of interest which may be difficult for an individual to decide. If a staff, volunteer, or member of the ARROW's Board discovers a case of corruption, this must be reported through the reporting system, described below. It is also possible to make contact if there is any suspicion, rumour or doubt as regards a case of corruption. A reporting form should in that case be completed and sent to the Standing Anti-Corruption Committee of ARROW.
- 4.2 ARROW has set up a Standing Anti-Corruption Committee which will receive the complaints. The Committee consists of two staff, elected by the staff and a representative of the ARROW's Board, appointed by the Board. The Committee serves for one year term and members can be re-elected. All complaints should be dealt with first by the committee and reported to the ARROW Management Committee who will refer it to the ARROW Board. If the complaint involves Managers or members of the ARROW's Board, the complaint shall be dealt with by the ARROW's Board. If the complaint involves both Managers and members of the ARROW's Board, the committee has the authority to appoint an impartial investigation committee. The investigation committee can consist of a member of the anti-corruption committee and/or external experts, e.g. the external auditors of ARROW. ARROW will receive complaints via an online form set up on its organisational website (under the Anti-Corruption drop down menu) which will be linked to an independent email set up for the Standing Anti-Corruption Committee. The Committee will be responsible for assessing each complaint received and making decisions available at monthly ARROW staff meetings or with the Management Committee.

- 4.3 On the basis of the reported complaints, the Standing Anti-Corruption Committee will evaluate whether an investigation committee should be appointed. The task of the Committee will in the first instance be to ensure that persons involved in the complaint are not involved in dealing with the complaint and that those dealing with the complaint are not disqualified. Furthermore, it will be the task of the Committee to take a decision whether the case should be dealt with further and also to inform the person who made the complaint about the result of the decisions taken.
- 4.4 The reported complaint will be treated confidentially and with respect for the person making the report and the person(s) or organisations, about whom there is suspicion. Anonymous reports are not accepted. All cases of corruption must be reported to the Standing Anti-Corruption committee, including cases which have been investigated locally in the partner country or cases which have a risk of personal safety.
- 4.5 Cases of corruption can end in dismissal and notification to the police, or other types of sanctions, if it becomes clear that the law has been violated. Donors will be advised, in case an investigation is commenced.

5. Publication

ARROW wishes to have an open policy regarding our practice for finances and accounting. Cases of corruption or cases where an investigation has taken place due to a suspicion of corruption will be published on the homepage of the organisation.

ARROW's anti-corruption policy will be made available to all through its organisational website.