

Anti-corruption Policy

Norwegian People`s Aid

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1 General

Corruption is now widely recognized to be one of the most important obstacles to development in many countries around the world.

The UN Convention against corruption states:

“Corruption undermines democratic institutions, retards economic development and contributes to government instability. Corruption attacks the foundation of democratic institutions by distorting electoral processes, perverting the rule of law, and creating bureaucratic quagmires whose only reason for existence is the soliciting of bribes. Economic development is stunted because outside direct investment is discouraged and small businesses within the country often find it impossible to overcome the "start-up costs" required because of corruption.”

NPA operates in many areas of the world where corruption is widespread according to internationally recognized agencies and organizations such as Transparency International.

NPA disapproves of all forms of corruption and has through the adoption of this policy, taken a Zero-Tolerance position towards it. This means that NPA will work actively towards the prevention and detection of corruption, and that NPA expect all employees to strictly adhere to the policy and established procedures.

NPA believes that a strong emphasis on anti-corruption and transparency will strengthen the reputation and trust towards our organisation, both from our donors, the general public, our cooperating partners and our employees.

2 Corruption

2.1 Definition of Corruption

NPA acknowledge the fact that the definition of corruption differs widely in the different areas where NPA actually operates. What might be considered corruption in one country, might be considered as acceptable practise in others.

Everybody would probably agree that bribes, extortion and the practise of demanding sexual favours in change of services, are highly unethical acts that must be termed as corruption. Other cases, such as favouritism and nepotism, are however acceptable - or almost acceptable - in some cultures.

NPA has chosen to adopt Transparency International 's definition of corruption , namely that corruption is; **“the abuse of entrusted power for private gain”**.

Corruption occurs in many forms. The list below gives just a few examples:

- **Bribery:** When someone improperly provides goods or services against some form of improper compensation

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- **Kickback:** A form of bribery, where someone involved in a purchasing process is getting a reward from the supplier for placing an order of goods or services.
- **Embezzlement:** Theft of resources for own use.
- **Evidence destruction:** Irregular destruction, removal or abuse of records
- **Extortion:** The act of obtaining something by force, threats or undue demands
- **Favouritism:** The unfair favouring of one person or a group at the expense of others (includes **nepotism** which is favouritism shown to relatives).
- **Knowingly omitting to report corrupt acts:** Deliberately omitting or refusing to report or act upon reports of any such irregular or dishonest conduct.
- **Maladministration:** Maladministration or financial misconduct in handling or reporting of money, financial transactions or other assets

2.2 Zero-Tolerance Policy

NPA has a Zero-Tolerance attitude towards corruption. This means that NPA disapproves of all conduct that can be termed as corruption.

It also means that NPA commits itself to follow up, investigate and prosecute cases where corruption has been detected to the full extent within established procedures, while always taking into consideration the severity of the case as well as local laws.

3 Training and Awareness Raising

NPA will address corruption issues on a regular basis in various ways in order to ensure that NPA employees are aware of this Anti-Corruption Policy and are motivated to abide by it. It is the Resident Representative in each country who has the responsibility to ensure that the policy is properly distributed and communicated in his/her country of responsibility. Furthermore it is the Resident Representatives responsibility to ensure that the Anti-corruption procedures and process descriptions found on the NPA Quality Management System. Are fully implemented and complied to.

4 NPA Code of Conduct

In addition to training and other means of awareness-raising, NPA's employees will be made aware of this Anti-Corruption Policy and the responsibilities it puts on all NPA employees on signing the Code of Conduct. All employees must state their acknowledgement and compliance with the Code of Conduct in writing. Managers should lead by example in preventing and avoiding corruption. . All employees have a duty to report cases of suspected corruption, following the reporting procedures for such cases. Reporting can be done anonymously, without fear of retaliations

5 Reporting & Follow up of reported suspicion of corruption

NPA is fully committed to follow up all cases of reported suspicion of corrupt acts, and take appropriate action when such reports actually leads to disclosure of corruption.

The measures taken against parties involved in corrupt acts, will always be measured against the severity of the case disclosed, and will be done in compliance with local Laws and regulations as well as NPA`s own policies and procedures.

It is NPA policy to protect the employees who report cases of suspected corruption (Whistle-blowers). Reports can be submitted anonymously if the whistleblower chooses to do so.

By signing the code of conduct all employees acknowledge that it is in fact a corrupt act not to report such suspicions, and all managers acknowledge that it is a corrupt act not to act upon such reports. NPA has established a standard procedure for **Alert Raising** with a separate **Check List**. It is the Resident Representatives responsibility to make sure these procedures and checklists are distributed and fully implemented in his/her area of responsibility.

6 NPA`s Cooperating Partners

NPA recommends that every NPA partner adopts similar rules as well as other anti-corruption measures in their own organization. NPA shall make an assessment of the cooperating partners control environment and communicate clearly NPA`s Zero-Tolerance policy towards corruption. NPA acknowledge the fact that some of our partners lack capacity and training in many of the disciplines necessary to establish sound control mechanisms. Establishing such must be a part of the capacity-building towards cooperating partners and NPA will provide training to our partners, either by using our own resources or hiring in external consultants.

7 Risk assessments

NPA will include a corruption risk assessment in all relevant work processes. NPA will strive to have a sound knowledge and understanding of potential risk areas, and will incorporate risk assessments in relevant documents such as Country Strategies, Work Plans, Project applications etc.

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