

## **Anti-Corruption Policy**

Revised: 2019-11-21

*Union to Union works actively to diminish corruption. This is mainly done through prevention; to ensure that the projects and programmes, conducted by the Swedish trade union movement, have good governance. If faults in the governance of the projects and programmes are discovered Union to Union will act quickly by investigating, reporting and rectifying suspect cases of corruption.*

*Open and responsible governance of society is a condition for real poverty reduction. Corruption deepens world poverty, undermines democracy and the protection of human rights, harms trade, hampers investments, endangers good social management and decreases the mutual trust between people and for the society.*

*The Union to Union statutes, adopted May 7<sup>th</sup> 2015, also state that:  
As an aid organization we apply to the regulation of the donor. Union to Union ensures internal governance and control, transparency and ethical conduct, and prevents bias.*

### **Responsibility**

The Anti-Corruption Policy was adopted by the board, October 2015, and is revised on a yearly basis. The Director is responsible for keeping the documentation updated and implemented in the organisation. The policy is monitored and evaluated by the secretariat and the board. An ongoing implementation of the policy shall lead to a continuous learning.

### **Main points of the guidelines**

*Union to Union subscribes to the definition of corruption used by Transparency International:*

*Generally speaking as “the abuse of entrusted power for private gain”. Corruption can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs. Grand corruption consists of acts committed at a high level of government that distort policies or the central functioning of the state, enabling leaders to benefit at the expense of the public good. Petty corruption refers to everyday abuse of entrusted power by low- and mid-level public officials in their interactions with ordinary citizens, who often are trying to access basic goods or services in places like hospitals, schools, police departments and other agencies. Political corruption is a manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political decision makers, who abuse their position to sustain their power, status and wealth.*

Corruption is the abuse of entrusted power for private gain. The concept contains phenomenon such as bribes and bribery, blackmail, nepotism, bias, fraud and misappropriation. Negligence and mismanagement can also be a form of corruption.

### **Target group**

The policy refers to all activities conducted and paid for by *Union to Union* and shall be applied by all parties involved. Every employee, elected official, partner and contracted consultant is responsible for practicing the policy in the work/mission, which includes preventing, remaining vigilant and attentive and reporting suspected corruption to the Director/Head of Finance of *Union to Union*.

### **Purpose**

By conducting a systematic anti-corruption work *Union to Union* wants to create knowledge and promote preventive measures, where mistakes are avoided and failures traced.

It is fundamental for *Union to Union* to always prevent, never accept corruption, and act and inform whenever there is suspicion of corruption. The following basic principles are important in the work to fight corruption:

- ⊗ 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.
- ⊗ Participation – To be able to fight corruption in practice trade union organisations need to have real ownership and influence on different levels over all relevant processes within the projects.

### ***Union to Union will make sure:***

- ⊗ that employees, elected officials, partners and contracted consultants have enough knowledge about the anti-corruption policy and that it is applied to the activities.
- ⊗ that documented routines, papers, forms and agreements that help in the prevention of corruption are known and used within the organisation.
- ⊗ that there are clear routines and systems to deal with suspected cases of corruption.
- ⊗ that updated instructions regarding how to send in feed-back and possible complaints are on the website.

### **Commitments for employees, elected officials, partners and contracted consultants**

Employees, elected officials, partners and contracted consultants shall:

- ⊗ work to ensure democratic processes based on participation and transparency.

- ⊗ estimate the risks of corruption when developing new routines, delegating responsibility and certifying agreements, recruitment, plans and budgets of activities, programmes and projects.
- ⊗ ensure that planned work has clear formulated purposes, expected results and activities and routines for evaluation.
- ⊗ learn from experiences and continuously improve routines and ways of co-operation.
- ⊗ estimate the capacity of partners to handle grants satisfactorily in cases when the activity includes management of funds.
- ⊗ when receiving gifts; make sure they only have a symbolic value, clarify that they are not received on personal behalf. All funds and materials that one has been entrusted with must be handled with care and ensure that all financial resources as well as any material gifts can be fully reported and declared whenever asked for during the mission.

### **Implementing the anti-corruption work**

The Director of *Union to Union* is responsible for co-ordinating and evaluating the implementation of the anti-corruption work and related documents. The Head of Finance coordinates the process in the office in case of suspicion of corruption and shall also handle incoming suspicions of corruption. There will be secure routines and mechanisms in order to protect individuals from related negative sanctions when reporting suspicions of corruption. The managing of the anti-corruption work should be documented and a part of our ongoing work with planning of activities and monitoring.

In cases of suspicion/detected cases of corruption, the Director is responsible for taking decisions regarding an inquiry and/or other measures, after co-ordinating with the Head of Finance and Head of Programme. Sida, our main-donor, shall quickly be informed if decisions are taken concerning an inquiry and/or other measures. If the funds derive from another external donor it should also be quickly informed. In all cases the involved Trade Union should be informed. Staff concerned can also be involved in the investigation of the suspected case. The Head of Communication shall immediately be informed concerning the matter, as well as the board in cases of major importance.

In cases of suspicion of corruption, and when it is justified, *Union to Union* will initiate an external review. In cases other than misappropriation of funds different types of restrictions, disciplinary actions or new routines may be imposed. A final decision is taken only after trade union consultation. Funding might be recalled, stopped or frozen. In cases of suspicion of a criminal act the matter shall be reported to the Police.