

ANTI-CORRUPTION POLICY

The Development Center (TDC) takes an active stance against of all forms of corruption with a zero-tolerance position. This entails that TDC will work actively with the prevention and detection of corruption.

TDC expects all employees to strictly adhere to TDC 's Anti-Corruption Policy (ACP) and established procedures, and expects all Managers, Country Directors/Programme Managers, and Heads of Departments, to make the ACP known among employees and to ensure that the policy and its tools are implemented. TDC expects all employees to acknowledge that it is a corrupt act not to report suspicions of corruption, and all managers to acknowledge that it is a corrupt act not to act with sufficient measures upon such incident reports.

The vision of TDC throughout all our work is “Cooperation and Responsibility in action”. TDC 's cooperation and solidarity with people in post war situations; in Iraq in the process of democratisations; with societies; government and organisations still developing their capacities, means a vulnerability to corruption and other forms of mismanagement. The need for comprehensive corruption risk management tools for NGOs working with development and democratisations in fragile environments is indisputable.

Definitions

In order to be able to detect and react adequately to all possible cases of corrupt practices, it is necessary to establish clear definitions of corruption. A broad and simplified definition of corruption is;

“Misuse of entrusted power or funds for one's own private benefit or for the benefit of family or friends”.

According to this policy and its tools and guidelines, within TDC 's organisation and in our cooperation with partner organisations the misuse of power to gain non-financial benefits will always constitute a corrupt act, and should be reacted on.

With the definition ,TDC acknowledge that there are situations and contexts where it is hard to determine whether the suspected incident or practice is a result of lack of capacity and/or competence, or if it is deliberate misuse of power and/or funds. This policy and its guidelines, with procedures for reporting, investigating and reacting should when appropriate be used in a capacity building manner, rather than as a reaction to reported incidents only..

Anti-Corruption Policy tools

TDC's Anti-Corruption Policy entails three tools:

1. Corruption Risk Management System (CRMS) - tools for preventing corruption
2. Alert raising procedure - procedure for reporting corrupt practices when detected, and whistle-blower policy
3. Handling cases of corruption – guidelines and procedures for detecting, communication, reporting, investigating, reacting, and closing

These tools within the Anti-Corruption Policy, that follow below, can be used as separate documents.

The CRMS describes necessary procedures and list documents, that will be part of TDC 's system for administration and project managements, and how these systems entails measures to reduce corruption risk, and subsequently incidents.

The Alert raising procedure comes to work when someone suspects corruption, with forms for reporting, addresses to use, guidelines for reporting etc.

Finally, when an incident has occurred, the Guidelines for handling corruption take you through the whole process from detecting an incident until the case is closed.

Measures that reduce the corruption risks

TDC have guidelines and structures in place to deter employees and partners from engaging in unethical behaviours. It is the distinct responsibility of the Director/ Programme Manager (in programmes where the PM is the senior manager), and Heads of Departments at Head Office, that the guidelines and procedures in the QMS are followed throughout projects and the programmer.

Recruitment procedures: TDC 's policy on Recruitment, hi- ring and contractual relation states that all vacancies, permanent or temporarily, must as a minimum be announced internally. Only qualified candidates should be called in for an interview. The panel sitting through the interview should between them decide who will be offered the job, but no job offer must be made until the process is concluded. See full guidelines in the QMS Personnel Handbook.

Financial management (handbooks and requirements): Adherence to TDC 's QMS and its handbooks, as mentioned above, assures transparency and efficiency within the accounts and the financial management systems. Special attention should be given to timely cash and bank reconciliations, segregation of duties, and monthly checklist. Logistic and procurement

procedures: Both our Ethical standards in Procurement and The Guidelines on Logistics – procurement outline the ethical standards staff must adhere to, including in business-related matters.

Contracts: TDC ’s Procedure on Quality Control of Legal Aspect of Contracts states that it is “extremely important to put points of agreement in writing before, during and after the negotiation and implementation of the agreement.” “Equal importance should be given to the follow-up of a contract implementation as the amount of resource is utilized during the negotiation of a contract”. See full guidelines in the QMS. Donors often have specific conditions and requirements related to corrupt practices. It is the responsibility of all Country Directors and/or Programme Managers to be aware of such terms and conditions, and to follow up accordingly in line with the requirements, as well as TDC guidelines.

Project documents: Programme/project plans and proposals should always outline TDC’s corruption risk mitigation efforts as part of the description of risks and assumptions for the achievement of the programme/project objectives.

Programme monitoring routines: During regular programmes follow-up visits to projects and programme, TDC Head Office representatives should discuss corruption risk mitigation. This should be included in the Terms of Reference for visits, and progress meeting agendas.

Corruption risk may also be part of more targeted formal monitoring missions. Discussions, status, and agreed action points should be outlined in the travel report /monitoring/progress report.

Regular Audits and Special Audits: TDC ’s guidelines on finance and audit states that “all entities in TDC should make proper preparations for audits according to Audit instructions and donor requirements.”.

Sanctions: As stated in TDC Guidelines for handling corruption, any TDC employee suspected of corruption should be suspended with all authorities and accesses. If the allegations are directed at an TDC partner immediate reaction will imply freezing of funds while the investigation takes place. TDC will also report corrupt practice to relevant judiciary body.

Anti-corruption training to partners and staff: All TDC employees must receive anti-corruption awareness training as part of their induction, and refresher courses, preferably annually. TDC should also offer our partners similar training.

Measures to detect corruption

Reporting and whistle-blowers: All TDC employees are obliged to report any unethical behaviour they may come across in relations to the programme, including incidents of

corruption. It is a corrupt act not to report suspicions of corruption, and for managers it is a corrupt act not to act upon such reports.

TDC also encourages partners and other members of the public to report incidents of corruption. TDC staff should report incidents to their line manager, or may go directly to the Internal Auditor, the Head of Finance/Chief Financial officer or the Secretary General. They may report anonymously, but are encouraged to make their identity known to ease the investigation. More information on how to report can be found on the intranet and on the TDC facebook site.

Partners and members of the public may also report to a relevant TDC manager or directly to the Head Office. There is also a form on the TDC site which allows anonymous reporting. TDC should not disclose the identity of any whistle-blower, whether the person has made the allegation anonymously or the identity is known to TDC , unless the organisations obtains the whistle-blower's consent.

Monitoring, and evaluations may, as well as being a method in reducing corruption risk, be a tool in uncovering it.

All TDC programmes should undertake regular monitoring and evaluations, and TDC 's tools and templates are developed to include measures for detecting corruption risks in projects.

Audits: TDC s external offices will be audited every year. Visits from Head Office, both for project reviews and for internal reviews, will be used as an additional tool. This may include surprise visits.

The guidelines follow a six step procedure for handling detected cases of corruption:

1. Detecting corruption
2. Information and communication about the incident
3. Reporting the incident
4. Investigating the incident
5. React appropriately TDC Employees

For employees disciplinary measures may be called for. All employees sign the Code of Conduct, and its provisions clearly states that disregard of its provisions may have contractual consequences and dismissal. Furthermore, all employees are liable for any losses caused by their mismanagement of TDC 's properties, and TDC shall have access to legal redress in the event of contravention of the code of conduct.

