

B - Governing document

DIGNI's ANTI-CORRUPTION POLICY



Approved by: Digni's Board of Directors

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Digni

Purpose – our mission

Digni is founded on Christian values, and along with our member organisations we work toward “a peaceful and transformed world where human dignity is upheld, poverty is eliminated, justice prevails, no one is left behind; a world where there is responsible stewardship of creation and climate justice succeeds.” We want a world free of corruption, and our focus on strengthening civil society makes fighting all forms of corruption¹ a part of our mission and identity.

The purpose of this policy is to describe how Digni approaches its work for anti-corruption, and how we respond. This policy is applicable to all employees and cooperating partners of Digni, its member and partner organisations, as well as consultants and other external parties.

Content – our approach

Digni regards corruption as one of our greatest global challenges. Corruption is illegal and affects us all, it is a barrier for development, and the consequences are severe. The people who suffer most from corruption are those who depend upon public resources for their wellbeing. General poverty amongst the members of the community wherein Digni works could create situations where local employees are vulnerable to undue pressure from people outside Digni. We will contribute to build strong civil societies and organisations both to make them less vulnerable to corruption and to provide them with tools and resources to fight against corruption.

In Digni, and in the Norwegian grant management system, *anti-corruption* encompasses all efforts carried out to ensure that the grants we manage are spent for the project’s purposes. The aim of this work is to strengthen civil society organisations and reducing the risk for all kinds of *mismanagement*. Mismanagement refers to all breaches on the grant agreement between Digni and Norad, which our members and partners are committed to. Mismanagement can be wrongdoings or deviations either as human failure, lack of competence, or weaknesses in the system.

If the mismanagement is regarded as a material breach of the agreement, and/or done intentionally, it will be defined as a *financial irregularity*. Financial irregularities are either illegal or include misuse of the government funds. Perceptions of what constitutes corruption may vary within and across cultural boundaries.² Many types of mismanagement are not regarded as irregularities, however all kinds of financial irregularities, such as corruption, bribery, nepotism, fraud, and misappropriation will be reacted upon.

Fighting corruption

Corruption is not just the responsibility of people or organisations with power. Everyone has the duty to fight against corruption where they live. Digni’s role is to work from the bottom-up to empower civil society organisations to fight against corruption in their local contexts and towards their local or national governments. Fighting corruption is not easy, however, we want to understand the risks and provide tools and resources for members and partners.

¹ Defined as “the abuse of power for private gain” (Transparency International)

² What we perceive as corruption is to be found in Annex 1

Financial integrity

Digni works with civil societies in fragile situations where the risk for corruption is high. Thus, our anti-corruption work includes fighting corruption as well as working for strengthened financial integrity at all levels in the Digni chain. Lack of transparency in the financial administration, non-existence or non-compliance with policies and procedures, complicated legal structure, unorthodox or late reporting or unexpected departure of staff are all examples on financial management that could hide corruption. Digni prevents and fights corruption by emphasizing financial integrity through updated tools and resources for members and partners.

Actions – our response

Digni brings anti-corruption on the agenda through our focus on prevention, detection, and handling of cases. We actively engage in the political debate on how anti-corruption and Zero-Tolerance politics should be implemented to prevent and reduce the level of corruption, as well as how to effectively detect corruption and handle cases that occur.

Preventing corruption requires continuous analysis of our contexts and the risks therewithin. Digni develops tools for an effective and appropriate risk monitoring. Having knowledge about where and in which situations corruption is likely to occur, allows Digni to develop tools and resources for fighting corruption in the local contexts and for strengthening financial integrity. Prevention of corruption is a combination of working with systems and human beings. We need to work with organisational culture, ethics, integrity, and biblical views on corruption to have a common understanding of why corruption should not occur. At the same time, we need systems and structures that reduce the risk of human failure or intended misconduct to take place.

Detecting corruption is a combination of systems, whistle-blower mechanisms, and financial integrity. Our efforts to detect corruption consists of regular and targeted actions. Regular actions will normally be formed as reviews or assessments that all organisations shall undergo during a given period. The purpose of these may be multiple, such as regular follow up, learning, detection, etc. Targeted actions will be spot checks, investigations etc. which are specifically designed to examine suspicions or allegations of corruption.

Handling corruption takes place when suspicions or allegations are confirmed. We react to all kinds of corruption acts by initiating investigation and considering freezing of funds or termination of the agreement. Such investigations may be done either by Digni, member organisation, or external auditors. All such steps shall be done in coordination with Digni.

Taking action if you suspect corruption

Digni requires all employees and individuals cooperating with Digni to report suspected mismanagement, also known as whistleblowing. This can be done by contacting:

- An employee at Digni. more information can be found on our website www.digni.no
- Norad through varsling@norad.no with your name and contact details or anonymously. More information on <https://www.norad.no/en/front/about-norad/whistleblowing/>

Digni is committed to respond to all reports of suspected corruption or violations of integrity. We will not tolerate any attempts to threaten or retaliate against whistle-blowers.

Annex 1: Terms used in connection with corruption:

Bribery: The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.).

Collusion: A secret agreement between parties, in the public and/or private sector, to conspire to commit actions aimed to deceive or commit fraud with the objective of illicit financial gain. The parties involved often are referred to as 'cartels'.

Conflict of interest: A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or can be perceived to influence a person's decision. The person then experiences a conflict between the interest of the organisation's priorities and his or her personal interest.

Embezzlement: When a person holding office in an institution, organisation or company dishonestly and illegally appropriates, uses or traffics the funds and goods they have been entrusted with for personal enrichment or other activities.

Facilitation payments: A small unofficial payment, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

Fraud: To cheat. The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). Countries consider such offences to be criminal or a violation of civil law.

Nepotism: Form of favouritism based on acquaintances and familiar relationships whereby someone in an official position exploits his or her power and authority to provide a job or favour to a family member or friend, even though he or she may not be qualified or deserving.

Solicitation: The act of a person asking, ordering or enticing someone else to commit bribery or another crime.

Whistleblowing: Reporting or informing of concerns about corrupt behaviour (see list above), criminal offence, someone's health and safety or covering up breach of policies. Whistleblowing may be done at any time about an incident that happened in the past, is happening now, or is believed to happen in the near future.