



## **Policy on corruption, fraud and conflict of interest**

*Approved by the Board 2015-03-10; revised version approved 2019-12-18.*

### **Definition**

Swedwatch has adopted Transparency International's definition of corruption: the abuse of entrusted power for private gain.<sup>1</sup> Fraud refers to the use of deception to achieve personal benefit. Conflict of interest concerns a situation in which a person's private interest is or could be inconsistent with the interests of Swedwatch.

### **Purpose**

Swedwatch denounces all forms of corruption, fraud and conflict of interest, a stance that shall be reflected in the conduct and actions of all employees and elected representatives. Staff and other representatives of Swedwatch must commit to a zero-tolerance policy on fraud, corruption and conflict of interest, recognising that such acts are contrary to fundamental values of integrity, transparency and accountability, and undermine organisational effectiveness and reputation. Swedwatch is responsible for assuring that adequate procedures are in place to prevent corruption, fraud and conflict of interest.

### **Scope**

All employees, elected representatives and consultants contracted by Swedwatch are bound to follow the policy, which is included as an appendix to work contracts.

### **Policy requirements**

- Elected representatives, employees and consultants shall not exploit their position at Swedwatch for their own or a third party's gain in their relations with employees, partner organisations or other individuals/groups.
- Elected representatives, employees and consultants shall not participate in decision-making nor prepare decisions in cases where their impartiality can be challenged. They shall not use their positions of knowledge gained from employment at Swedwatch in a way that could create a potential conflict between the interests of Swedwatch and themselves. Any actual or perceived violation of this prohibition shall be promptly disclosed in writing to the Director.
- It is prohibited to receive or allow to be promised, request or submit, promise or offer bribes or other improper rewards, recompense, compensation, improper gain or advantage of some form that may constitute illegal or improper behaviour. Benefits without financial value are also covered by this policy.
- Elected representatives, employees and consultants are expected to be cautious when being offered gifts from colleagues, partners, companies, public authorities or other individuals or

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<sup>1</sup> [http://www.transparency.org/whoweare/organisation/faqs\\_on\\_corruption/2/](http://www.transparency.org/whoweare/organisation/faqs_on_corruption/2/)

groups. It is prohibited to accept gifts unless of insignificant value<sup>2</sup> and an appropriately modest expression of appreciation. Swedwatch's employees, elected representatives and consultants should not let themselves be invited to lunch or dinner by companies, public authorities or parties from whom Swedwatch may get an assignment. Exceptions can be made if lunch or dinner is provided as part of an official event and offered to all participants. Any gifts received should not be viewed as personal but rather belonging to the office.

- Any form of deception which is used to bring personal benefit to an employee, consultant or elected representative of Swedwatch is strictly prohibited. This includes misrepresentation of facts, intentional omissions in reporting, falsifying invoices and receipts, etc.
- Elected representatives and employees shall not commit the organisation, financially or otherwise, unless such action falls within the scope of their decision-making powers.
- Employees shall handle funds and material to which they are entrusted with care and be prepared to account for such funds or material, in full, at any given time.

### **How to report violations of the policy**

Any suspicions of corruption, fraud or conflict of interest should be reported immediately to the Director of the organisation or to the email address: [info@swedwatch.org](mailto:info@swedwatch.org), which may be used for anonymous reporting. All information received will be treated confidentially. In case the suspicion concerns the Director, it should be reported directly to the Chair of the Board of the organisation. When corruption, fraud or conflict of interest is suspected to exist in relation to projects, this will be reported to the relevant funder, for example if in relation to projects financed by Sida, Sida will be informed. Actions to stop corruption/fraud/conflict of interest must also be taken immediately and an investigation will be initiated. When relevant this will be reported to the police. Sanctions may be imposed against a person involved in any violations.

### **Implementation and accountability**

Swedwatch's Director will be accountable for the implementation of the policy. All staff, elected representatives and consultants have a duty to adhere to the policy; in addition to making a formal commitment as part of their employment contracts, Swedwatch staff receive an awareness training on corruption, fraud and conflict of interest in development work. The Head of Finance and Administration will report annually on any compliance issues, as well as suggesting mitigation measures and adjustments. A record will also be maintained noting staff which have received the awareness training.

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<sup>2</sup> Max 500 SEK.