



PARLIAMENTARY FORUM
ON SMALL ARMS AND LIGHT WEAPONS

Anti-Corruption Policy¹

The purpose of this policy is to establish controls to ensure compliance with applicable anti-corruption regulations, and to ensure that the Forum's operations are conducted in a socially responsible manner. The policy shall be revised bi-annually while any improvements identified will be made as soon as possible.

General

Corruption is universally recognised as a palpable obstacle to sustainable development and capacity development around the world. Widespread corruption has not only direct negative consequences for society but also undermines social trust². For the Parliamentary Forum it is important to identify potential risks and actively work to prevent corruption. Employees and members of the Forum arrange and participate in activities that take place all around the world. Clear guidelines to resolve any ambiguity that may arise will facilitate the work of both employees and members. Effective policies on corruption not only generate increased transparency and accountability towards donors and partners, but also increase the efficiency of the Forum's work.

The Forum expects all employees and members to strictly adhere to this policy and encourages the proactive usage of the policy as a guiding tool in their work and not solely as a reaction to incidents³. The Forum strives to be up to date on this issue and intends to always take preventive steps in order to avoid any form of corruption. For this reason it is important to keep in mind that this policy is subject to improvement according to the challenges that may appear in the future. A strict approach against corruption is also a means

¹ Revised version adopted by the Board of the Parliamentary Forum at meeting on 7th of April 2017. Original version adopted by the Board on the 20th of October 2015.

² United Nations Convention Against Corruption
https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

³ During April 2017, all Board and Staff members sign a Certificate of Understanding as to ensure compliance with the Anti-Corruption Strategy and other key steering documents.

for the Forum to further ensure that the people engaged in the Forum's work do so because of dedication and interest rather than for personal gain.

Definition

The definition of corruption is subject to lively debate. How to delimit and measure corruption has so far not achieved full consensus. The Forum adheres to the definition of corruption used by the Swedish International Development Cooperation Agency (Sida) which is: "abuse of trust, power or position for improper gain. Corruption includes, among other things, the offering and receiving of bribes – including the bribery of foreign officials – extortion, conflicts of interest and nepotism."⁴

Responsibilities

The Forum takes a zero tolerance approach to bribery and corruption. This applies to all projects and activities organized or conducted by the Forum. Since the work of the Forum is conducted by and with parliamentarians it is of particular importance to engage in fighting corruption. The negative effects of corruption are unambiguous. Corruption reduces citizens' trust in parliamentary work as transparency and accountability are democratic corner stones, the effectiveness of political governance, and the overall level of democracy in a country. Further, there is a negative correlation between levels of corruption and important aspects of human development such as; equality, poverty and access to basic needs.⁵ This underlines that for the Forum to effectively succeed in its parliamentary work it is of outmost importance to seriously address the risk of corruption and take measures to prevent its occurrence.

In addition to the zero tolerance approach, the Forum further underscores to always take action whenever corruption is suspected, even in situations when it might obstruct or hinder operations. This approach towards corruption should be applied in connection with the exercise of the entire work of the Forum, at all levels.

⁴ Sida (2014). 'Approaches and methods'. <http://www.sida.se/English/how-we-work/approaches-and-methods/our-work-against-corruption/>

⁵ Rothstein, Bo and Sören Holmberg (2011) 'Correlates of Corruption' http://qog.pol.gu.se/digitalAssets/1357/1357840_2011_12_rothstein_holmberg.pdf

Besides the vested interests in fighting corruption the Forum also has a responsibility towards its donors. As it is clarified in the current contract between the Forum and its donors Sida and the United Nations, the Forum shall actively work to prevent corruption and other forms of misuse of funds. This requires the Forum to assess any risk of corruption when planning and implementing activities, and if necessary, take mitigating measures. The Forum commits to examine the incidence of corruption; to identify and take action if there is reason to suspect corruption or other improper gain. On suspicion of such an occurrence, the Forum shall forthwith inform the donors, and, if necessary, take legal action.

Conflict of interest

One of the main principles in anti-corruption work is to avoid conflicts of interest. A conflict of interest situation arises when the “private interests” of a Board member or staff compete or conflict with the interests of the Forum. This includes situations where employees or members’ private or financial interest conflicts with their responsibilities, duties and obligations; situations which could negatively affect the employee or member’s ability to act in the Forum’s interest; or when their actions and decisions risk compromise or undermine the Forum’s trust and reputation.⁶ The Forum expects its staff and members to show good judgement and common sense and thereby act in a socially responsible manner. Since the Forum is an organisation of parliamentarians this requirement is essential for efficient and sustainable operation of the activities and for results achievement.

Potential risk for conflict of interest, perceived or actual, should be reported to the Forum as soon as identified. Once reported, the evaluation of potential conflict of interest is the responsibility of the Secretariat which, if deemed necessary, shall be responsible for informing the Board.

Gifts and Benefits

In line with the overall mission of the Forum and as to ensure continued solid reputation as a professional organisation, the activities of the Forum must always be free from the perception that favourable treatment is sought. As a general rule, members and employees shall not give or offer gifts as to avoid the risk of perception of favourable treatment and to ensure transparency of public resources as the budget of the Forum derives from official development cooperation sources. If exceptions are to be made, given cultural and contextual reasons, for example a minor hosting gift in relation to international activities, the gift shall

⁶ HR Council <http://hrcouncil.ca/hr-toolkit/policies-guideline.cfm#steps>

be paid at the employers or members own expense, not by donor funding, that is public funding. Likewise, as a general rule, members or employees shall never accept gifts. In case a situation occurs where culture and context makes it impossible to reject a gift, the gift shall be perceived as corporate and be kept at the Secretariat as an asset for the organisation as such. In no occasion shall an employee or member accept to receive gifts in cash or where a favour is expected in return.

This guideline aims to prevent and ensure the Forum's work practices against corruption. Laws and practices may differ among countries, hence it is wise to take precaution and when in doubt seek advice to avoid any appearance of impropriety. Employees of the Forum operate under Swedish law and shall adhere to the rules established by the authority in question, Skatteverket⁷ and stipulated donor regulations.

Routines for Remuneration and Activity related expenses

The Forum's funds and material should be handled responsibly and usage of financial means should be accounted for. In this context it should be highlighted that the Forum does not make facilitation payments or provide sitting allowance. Members are not paid by the Forum to participate in activities. In order to limit the risk for corruption the Secretariat of the Forum takes responsibility for travel and accommodation expenses. This standard procedure allows the Forum to keep strict control over expenses and limits the risk for inappropriate double payment. Exception to this rule and situations where other sources are responsible and have to be repaid requires proper justification, documentation and shall be carefully considered before being authorized.

The Forum provides compensation corresponding to the actual amount and claims for compensation shall always be supported by relevant documentation, such as original receipts or invoices. Rules regarding reimbursement and per diems are further explained in the *Policy on per diems*.

Any additional personal arrangement required by a member related to an activity shall be arranged by and financed by the member in question, as it is beyond the responsibility of the Forum.

Financial oversight is conducted annually by external auditors. The auditor hence has a responsibility to scrutinize that the policy has been followed and point out weaknesses that

⁷ <https://www.skatteverket.se/privat/skatter/arbeteinkomst/formaner/gavor.4.7459477810df5bccdd4800014379.html>

may be potential sources of corruption. The auditor acts impartially and hence serves as an important element in the work against corruption.

Monitoring, review and reporting channels

The Secretariat is responsible to implement; monitor the effectiveness and review the implementation of this policy under the strategic guidance and over-all responsibility of the Board. The Secretariat shall regularly consider its suitability, adequacy and effectiveness. Possible changes and additions to this policy shall be brought up bi-annually when revised versions of this policy will be subject to approval of the Board. All employees and the Board are responsible for the success and compliance of this policy and shall ensure they use it to disclose any suspected danger or wrongdoing.

In case of suspicion of corruption there are three possible channels of reporting:

- The Secretariat of the Parliamentary Forum, Secretary General Karin Olofsson, e-mail: olofsson@parlforum.org
- The Board of the Parliamentary Forum, President Senator Daisy Tourné, e-mail: tourne17@gmail.com
- The Swedish International Development Cooperation Agency (Sida): <http://www.sida.se/English/contact-us/Whistleblower/>

As the Forum receives funding from Sida, report through this channel can be made if you suspect corruption in a development cooperation contribution or if you are aware of that development cooperation funds are not being managed in accordance with what has been agreed.

All reported suspicions are received and managed by Sida's investigation group, e-mail: investigation@sida.se

Guiding Principles

- The Forum does not take part in acts of corruption, or pay bribes or receive kickbacks either directly or indirectly.
- This policy shall have effect in all the Forum's projects and activities.
- Employees, members, and volunteers are required to act upon suspected cases of corruption and to inform the Forum in accordance to this policy.
- Employees and Board members shall declare any actual or perceived conflict of interest as and when it arises.
- In cases where impartiality may be questioned, members and employees have an obligation to inform the Forum of their possible bias.

- Employees and members should not commit the Forum, financially or otherwise, outside their delegated authorisations.
- Employees and Board members shall ensure to comply with Swedish legislation; regulations stipulated by donors and when applicable, national legislation.
- The Forum expects our partners and other business associates to adhere to this policy.