



PARLIAMENTARY FORUM
ON SMALL ARMS AND LIGHT WEAPONS

Anti-Corruption Policy

Adopted by the Board of the Parliamentary Forum on the 20th of October 2015

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 great obstacle to development and capacity development around the world. Widespread corruption has not only direct negative consequences for society but also undermines social trust¹. 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 greater 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 incidents. 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 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.

¹ United Nations Convention Against Corruption
https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

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 Sida's definition of corruption 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."²

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, 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.³ 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 undertakes 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.

Besides the vested interests in fighting corruption the Forum also has a responsibility towards its donors. As it is clarified in the current contract (2015) between the Forum and its main donor Sida, 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

² Sida (2014). 'Approaches and methods'. <http://www.sida.se/English/how-we-work/approaches-and-methods/our-work-against-corruption/>

³ Rothstein, Bo and Sören Holmberg (2011) 'Correlates of Corruption' http://qog.pol.gu.se/digitalAssets/1357/1357840_2011_12_rothstein_holmberg.pdf

corruption or other improper gain. On suspicion of such an occurrence, the Forum shall forthwith inform Sida, and, if necessary, take legal action.

Conflict of interest

The main principle 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.⁴ 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.

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

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 that could be regarded illegal or improper and not offer gifts to improper recipients. Likewise, members or employees shall never accept gifts that are given in cash or where a favour is expected in return. All gifts –given or received- must be in accordance with the overall mission of the Forum as well as national laws and regulations.

This guideline aims to prevent and protect the Forum’s work practices against corruption. Offers, such as hosting gifts, meals, or corporate items given to participants in meetings and conferences, are acceptable as long as they are of nominal and reasonable value and promote the Forum’s legitimate interests. Laws and practices differ among countries, hence it is wise to take precaution and when in doubt seek advice to avoid any appearance of impropriety. If an employee or member believes there is an appropriate reason to make an exemption to this policy for an individual situation, he or she shall contact the Secretariat prior to giving or

⁴ HR Council <http://hrcouncil.ca/hr-toolkit/policies-guideline.cfm#steps>

accepting the gift. Employees of the Forum operate under Swedish law and shall adhere to the rules established by Skatteverket⁵ regarding the giving and receiving of gifts.

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 Forum takes responsibility for travel and accommodation expenses. In cases when this procedure is not possible, in-kind remuneration is provided to the extent possible. 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.

In cases where in-kind services are not possible the Forum provides compensation corresponding to the actual amount. 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 assure that the policy has been followed and point out weaknesses that may be potential sources of corruption. The auditor acts impartially and hence serves as an important element in the work against corruption.

Monitoring and review

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

⁵ <https://www.skatteverket.se/privat/skatter/arbeteinkomst/formaner/gavor.4.7459477810df5bccdd4800014379.html>

are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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 should 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 should ensure to comply with Swedish legislation and, when applicable, national legislation.
- The Forum expects our partners and other business associates to adhere to this policy.