



PARLIAMENTARY FORUM
ON SMALL ARMS AND LIGHT WEAPONS

Anti-Corruption Policy¹

¹ The present version was adopted by the Board of the Forum at the Board meeting on 19th of April 2023. The original version was adopted by the Board on the 20th of October 2015; revised version was adopted by the Board on the 7th of April 2017.

Contents

- Introduction 3
- Definition..... 4
- Responsibilities of the Forum 4
- Guiding Principles..... 5
- Conflict of Interest 6
- Gifts and Benefits 6
- Routines for Remuneration and Activity Related Expenses..... 7
- Monitoring, Review and Reporting Channels..... 8
- Whistleblowing..... 8
- Investigating Misconduct, Suspected Fraud and Corruption 9
- Investigation Procedure 9

Introduction

The purpose of the Anti-Corruption Policy is to establish controls to ensure compliance with applicable anti-corruption regulations and to safeguard that the operations of the Parliamentary Forum on Small Arms and Light Weapons (the Forum) are conducted in a socially responsible manner. The policy is continually revised based on identified areas of improvement and in compliance with applicable anti-corruption regulations.

Corruption is universally recognised as a palpable obstacle to sustainable development and capacity development around the world. Corruption has not only negative consequences for society but also facilitates organised crime and terrorism, undermines social trust² and democracy, and exacerbates inequality³. For the Forum, it is important to identify potential risks and actively work to prevent corruption as part of its overall vision to contribute to the achievement of more peaceful and sustainably developed societies. The Forum implements and participates in activities that take place all around the world. Clear guidelines to resolve any ambiguity that may arise will facilitate the work of the Board, employees, and members of the Forum, when representing the organisation. Effective policies on corruption are vital as part of anti-terrorism measures, and not only generate increased transparency and accountability towards donors, partners, and members, but also increase the efficiency of the Forum's work, being a precondition for safeguarding democracy and the realisation of the overall vision.

The Forum expects all representatives: Board members, employees and members (hereinafter, Forum representatives) and contractors, as applicable, involved in the operations of the organisation to strictly adhere to the current policy. The proactive usage of the policy is encouraged, as a guiding tool in the work and not solely as a reaction to incidents⁴. The Forum consistently strives to prevent corruption through precautionary measures. Having a zero-tolerance against corruption is also a means for the Forum to further ensure that the persons engaged in the Forum's work do so because of dedication and interest rather than for personal gain.

² United Nations Office on Drugs and Crime, New York, 2004. *United Nations Convention Against Corruption*. Accessed on 2023.03.30: https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

³ Transparency International, 2023. *What is corruption?* Accessed on 2023.03.30: <https://www.transparency.org/en/what-is-corruption>

⁴ As of April 2017, all Board members as well as employees sign a Certificate of Understanding as to ensure compliance with the Anti-Corruption Policy and other key steering documents.

Definition

While various definitions of corruption exist, the Forum adheres to the definition of corruption used by Transparency International which is: “the abuse of entrusted power for private gain”.⁵ Corruption can take many forms, and can include behaviours like:

- demanding or taking money or favours in exchange for services,
- misusing public money or granting public jobs or contracts to their sponsors, friends, and families,
- bribing officials to get lucrative deals.

Responsibilities of the Forum

The Forum has a zero-tolerance approach to corruption. The approach applies to all projects and activities organised or co-organised by the Forum, as well as for Forum representatives participating at externally organised activities, in line with the overall vision of the Forum to contribute to the achievement of more peaceful and sustainably developed societies. Since the work of the Forum is conducted by and with parliamentarians, it is of particular importance to engage in countering corruption, as the position of parliamentarians per se constitutes a risk of being exploited for corruption among other things.

The negative effects of corruption are unambiguous. Corruption reduces citizens’ trust in parliamentary work and institutions, thereby reducing the effectiveness of political governance. Furthermore, there is a negative correlation between the level of corruption and the development of equality welfare, and access to basic services.⁶ Hence, the prevention of corruption is an inherent part of the Forum’s work to strengthen democratic institutions, as well as to underpin the parliamentary work of the members. Transparency and accountability are corner stones of a functioning democracy.

In addition to the zero-tolerance approach, the Forum further stresses to always act whenever corruption is suspected, even in situations when it might obstruct or hinder operations. The approach regarding corruption shall be considered consistently in the work of the Forum, at all levels.

⁵ Transparency International, 2023. *What is corruption?* Accessed on 2023.03.30: <https://www.transparency.org/en/what-is-corruption>

⁶ Davis, Brenda. 2016. *Corruption: Political, Economic and Social Issues*. Ed. Brenda Davis. Hauppauge, New York: Nova Science Publishers, Inc., Print.

Besides the vested interests in preventing corruption, the Forum also has a responsibility towards its donors. As such, the Forum shall actively work to prevent corruption and other forms of misuse of funds. It 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 any incidence of corruption and to identify and take action if there is reason to suspect corruption or other improper gain. Upon suspicion of such an occurrence, the Forum shall investigate the issue, forthwith inform the donors, and, if necessary, take legal action. The Forum is consistently complying with all donor agreements and would in such case recover any part of the funds misappropriated through an act of fraud or corruption.

The Forum recognises its role and potential for influencing the anti-corruption landscape by taking measures to promote transparency and accountability within the organisation and at its own activities. Among the measures are the current Anti-Corruption Policy, and also the organisation's *Code of Conduct*.⁷ Furthermore, the Forum ensures transparency and accuracy regarding its financial reports and donor commitments, while still maintaining respect and integrity of affiliated parties and individual donors.⁸

Guiding Principles

- The Anti-Corruption Policy shall have effect in the entire scope of the Forum's operations: projects and activities, as well as daily activities.
- The Forum does not take part in acts of corruption, pay bribes, or receive kickbacks either directly or indirectly.
- Upon suspected cases of corruption, Forum representatives and contractors, as applicable, are required to act and to inform the Forum in accordance with this policy.
- Forum representatives and contractors, as applicable, shall declare any actual or perceived conflict of interest as and when it arises.

⁷ Parliamentary Forum on Small Arms and Light Weapons. *Code of Conduct*. Accessed 2023.03.30:

<https://parliamentaryforum.org/wp-content/uploads/2018/09/Code-of-Conduct.pdf>

⁸ UNODC, 2019. *Civil Society for Development: Opportunities through the United Nations Convention against Corruption*. Vienna, page 21.

- In cases where impartiality may be questioned, Forum representatives and contractors, as applicable, have an obligation to inform the Forum of their possible bias.
- Forum representatives and contractors, as applicable, should not commit the Forum, financially or otherwise, outside their delegated authorisations.
- Swedish legislation, regulations stipulated by donors and when applicable, other national legislation are to be complied by Forum representatives and contractors, as applicable.

Conflict of Interest

One of the main principles of anti-corruption work is to avoid conflicts of interest. A conflict of interest arises when a private interest of a representative conflicts with the interests of the Forum. Furthermore, it includes situations where the aforementioned parties' private or financial interests are in conflict with their responsibilities, duties, and obligations; situations which could negatively affect the parties' ability to act in the Forum's interest; or when their actions and decisions risk compromising or undermining the Forum's trust and reputation. The Forum expects its representatives to show sound judgement and common sense and thereby act in a socially responsible manner. Since the Forum is an organisation of parliamentarians, the requirement is essential for efficient and sustainable activities and for results achievement.

Potential risks for conflicts of interest, perceived or actual, should be reported to the Forum as soon as identified. Once reported, the evaluation of potential conflicts of interest among the employees of the Secretariat is the responsibility of the Secretary General. Meanwhile, the Secretariat will evaluate any conflict of interest among the Board members, members, and contractors, with advice from the Board, or external auditor, as applicable. In the case of the Secretary General holding a conflict of interest, it falls upon the Board to make an evaluation and assess the conflict of interest.

Gifts and Benefits

In line with the aforementioned overall vision 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 or given. As a rule, Forum representatives shall not 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. Likewise, Forum representatives shall never accept gifts. If a situation occurs where culture and context make 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. On no occasion shall a representative accept to receive gifts in cash or where a favour is expected in return.

The guideline aims to ensure the Forum's 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 Swedish Tax Agency (Skatteverket)⁹ as well as any stipulated donor regulations.

Routines for Remuneration and Activity Related Expenses

The Forum's funds and material shall be handled responsibly, and usage of financial means shall be accounted for. Regarding the matter 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. To ensure financial accountability, the Secretariat of the Forum takes responsibility for coordinating costs related to participation of members in the activities, including coordinating travel and accommodation expenses. The described standard procedure allows the Forum to keep strict control over expenses and hence limits the risk of corruption. Exceptions to the rule, in situations where other external stakeholders are responsible and must be compensated, requires proper justification, documentation, and shall be carefully considered before authorised.

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*.

Additional personal arrangements required by a representative of the Forum, related to an activity, are not allowed. If allowed, on exceptional basis, all such arrangements shall be

⁹ Skatteverket, 2023. *Gåvor till anställda*. Accessed 2023.03.30:

<https://www4.skatteverket.se/rattsligvagledning/323999.html?q=f%C3%B6rm%C3%A5n+g%C3%A5va#h-Jubileumsgava>

coordinated and financed by the person in question, as it is beyond the responsibility of the Forum.

Financial oversight is conducted annually by an external qualified independent auditor. The auditor has a responsibility to scrutinise the accuracy of the Forum's financial system and reports and to point out any potential irregularity. 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 for implementing the present Anti-Corruption Policy, as well as to monitor its effectiveness and review its compliance under the strategic guidance and overall responsibility of the Board. The Secretariat shall regularly consider its suitability, adequacy and effectiveness. Changes and additions to the policy shall be brought up to the Board for their approval. All parties are responsible for the success and compliance of the policy and shall ensure its usage to disclose any suspected corruption or wrongdoing.

Whistleblowing

Whistleblowing is the disclosure of information about suspected wrongdoing to individuals or entities believed to be able to effect action. It is one of the most effective ways to uncover corruption, fraud, mismanagement, and other wrongdoings.¹⁰ As such, the Forum invites reports from any person (Forum representative, contractor or other person) who might acquire information on or suspicion of wrongdoing committed in, or by, the Forum. In case of suspicion of corruption or misconduct, there are two channels for reporting:

- The Secretariat of the Forum, the Secretary General¹¹.
- The Board of the Forum, the President¹².

¹⁰ Transparency International, 2022. *Internal Whistleblowing Systems: Best practice principles for public and private organisations*. Accessed 2023.03.30: https://images.transparencycdn.org/images/2022_Internal-Whistleblowing-Systems_English.pdf

¹¹ As of adoption of the document: Karin Olofsson: olofsson@parlforum.org

¹² As of adoption of the document: Board Members: President Hon. Dr Raphael Chegeni, Adjunct Board Member, co-founder Mr. Christer Winbäck, Hon. Vincent de Paul Emah Etoundi, Hon. Sahar Qawasmı, Hon. Marko Djurısic, Mrs. María Pía Devoto. <https://parliamentaryforum.org/who-we-are/the-board/>. President Hon. Dr. Raphael Chegeni, e-mail: rchezeni@yahoo.com.

Anyone submitting a report of suspected corruption or misconduct, anonymous or otherwise, is legally protected in accordance with Swedish Law.¹³

Investigating Misconduct, Suspected Fraud and Corruption

If a suspected case of corruption is uncovered, it must be reported according to the manner stated previously. In consultation with the persons notified, arrangements must also be made for a comprehensive investigation of the issue. In the case of the Forum, the following are responsible for ensuring investigations are carried out:

- The Secretary General.
- The Board of the Forum.

In all circumstances those responsible should also consult with an external party regarding the investigation process. If the case has financial implications, it is recommended that a person with suitable financial skills and experience such as the financial officer is part of the investigative team.

Investigation Procedure

- Depending on the magnitude and the complexity of the misconduct, and in line with the principle accounted for in the last paragraph of the section “Conflict of Interest”, investigation will be carried out either within the organisation by the Secretary General and/or the Board, or by external parties such as an independent external auditor with specialised forensic accounting expertise, or where deemed appropriate, by the legal authority in question. The decision whether to conduct internal or external investigation services, or a combination of both, will be made by the Secretary General and/or the Board, with the assistance of an external auditor as necessary. In case there is suspicion that the specific incident being investigated is a criminal act in the country it is taking place, the legal authority responsible will be notified.
- Investigations will be conducted without regard to any Forum representative’s or contractor’s relationship to the organisation, position, or length of service. The

¹³ Lag (2021:890) om skydd för personer som rapporterar om missförhållanden. https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-2021890-om-skydd-for-personer-som_sfs-2021-890

function in charge of the investigation will retain and secure records of all actions in the investigation, in the event of any future criminal, civil or disciplinary action.

- The investigator will determine who should be involved in the investigation and take care to avoid a conflict of interest situation for any person who might have close working relationships with the individual(s) being investigated in the case.
- The investigation will produce a report detailing the findings and conclusions, based on thorough documentation including interviews – if necessary- and recommendations for future action. The investigation process will not be disclosed to, or discussed with, any person apart from the following functions, or equivalent: Secretary General, the Board, external auditor. The measure is important to avoid damaging the reputation of those suspected of wrongdoing and subsequently found innocent, and to protect the organisation from potential civil liability and loss of reputation and goodwill.
- In the event of suspected fraud or corruption, the Forum will, apart from its own investigation, provide access to relevant information to the potentially affected donor and any investigative team the donor might employ.
- Individuals who are judged guilty of corruption or have committed gross misconduct will be dealt with in accordance with the Statutes and Code of Conduct of the Forum, and applicable legislation. Proven allegations of misconduct will result in disciplinary actions, including possible dismissal of employees and exclusion of Board members or members, and termination of collaboration with contractors. The function responsible for deciding on any disciplinary action is the Secretary General in consultation with the Board and on the advice of the external auditor, or legal authorities, as applicable.
- The Forum will in cases where deemed necessary share details of misconduct with potentially affected external parties such as donors and legal authorities. In the event where a Forum representative or contractor would be found to have committed fraud; the personal details (e.g. name, date of birth, address, and nationality) and details of the fraud might also be shared with aforementioned parties.
- In addition, as appropriate in relation to activities realised internationally, the Forum will refer cases to the local law enforcement agencies when deemed as an alleged criminal offense. Consideration should be given to the local context and any consequences in terms of human rights of initiating criminal prosecution against involved parties.