

Anti-corruption policy for the Danish Family Planning Association

1. Introduction

The anti-corruption policy applies to all volunteers, employees, leaders and the Management Board at the Danish Family Planning Association (DFPA) and our partners. Everyone mentioned above is required to follow this anti-corruption policy, and any infringement of this policy will be treated in accordance with the rules for follow-up and reporting described in this document.

DFPA defines corruption as *misuse of trusted power and means for the sake of own gain*. This definition is used by Danida and can be found in the Danish penal code and in international conventions. Corruption can be exemplified as bribery, fraud, embezzlement and extortion.

Corruption is a threat against good governance, sustainable development, democratic processes and good business practice and contributes to social inequality. DFPA is at all times responsible towards our target groups, cooperating partners and donors, and prevention of corruption is crucial for the development results, we wish to achieve in our work.

The purpose of this anti-corruption policy is to support ethics of work which are characterized by a high personal and organisational integrity, both internally and in relation to partners and donors. The regulations of DFPA and the membership of DFPA within IPPF¹ make clear demands to prevent and fight corruption, and we will fulfil this responsibility by promoting transparency and democratic control within our own organisation and our partner organisations in the South and North. This is among others done in the way that members of the Management Board and leaders of the Secretariat each year complete and sign a document, where possible overlapping interest and conflicts are described.

According to Transparency International's corruption index² many of the countries in which DFPA works are among the countries with the highest risk of corruption. DFPA must ensure that the funding, which we administer, does not end in the wrong pockets. DFPA receives funding from many different sources and donors, and we have a responsibility to administer this funding in a responsible manner.

¹ The Danish Planning Association is a member of the umbrella organisation International Planned Parenthood Federation (IPPF)

² <http://www.transparency.org/>

DFPA works in developing countries in complex contexts with various languages and cultures and recognises that we and our partners must be able to carry out our work within these differences. This makes big demands on all to maintain and promote a high ethical standard and responsible behaviour built on knowledge, respect and common sense.

DFPA follows Danish legislation in Denmark and abroad. We also follow the national legislation where we work and observe the rules and regulations of international law.

2. Principles

1. Conflict of interest

We will avoid any inexpedient conflicts of interest – real or potential – between personal interest, interest of DFPA, and the interest of our partners.

Avoiding conflict of interest is the overall principle in fighting corruption. A conflict of interest can arise from situations in which you as a DFPA employee has a private interest that could influence your professional performance for DFPA or one of our partners.

Conflicts of interest occur frequently and are not necessarily corrupt. It is how they are identified and managed that is important. If conflicts of interest situations are not properly identified and managed, they can endanger the integrity of DFPA and our partners, and can result in corruption. The staff member is expected to show good judgment and when in doubt, contact the superior. In questions of conflict of interest it is important to use personal judgment and common sense to make the right decisions.

2. Abuse of power and extortion

We will not seek to influence any person or institution for private purpose by using our official position or offering them personal advantages. Likewise, we will not use DFPA's property, facilities, services and financial resources for private purposes except when permission is given. We will not use any forms of extortion as a method to gain advantages.

This principle implies that you should not use your professional status in DFPA or in a partner organization for private gain. An example could be abusing good relations to suppliers to gain reduced prices for own advantage (e.g. computers, cars, food, consultant support or traveling for private use, etc.). You are also not allowed to abuse your power as a manager to get personal favors or services done by employees.

3. Fraud and Embezzlement

Fraud and embezzlement are illegal and must not be used as methods to gain

personal or professional advantages or property in relation to DFPA, partner organizations or any other stakeholders.

Fraud is defined as economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian. Examples of fraud and embezzlement are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, or misusing funds entrusted to us.

DFPA and our donors' rules for accounting and documentation shall therefore be applied to at all times. E.g. approval of payments has to follow the instructions in the "Budget and Accounting Manual for Danida projects" and approval of programmes and projects has to follow the DFPA "Programme and Project Manual". All involved parties are expected to show honesty and not to abuse their positions for own gain.

4. Bribery

Bribery is defined as the act of offering someone money, services or other valuables, in order to persuade him or her to do something in return.

Bribery is illegal in all countries and harms the opportunities for fair and transparent relations of cooperation and the foundation for a democratic society. One example is that we do not receive bribes from potential partners or suppliers to make contracts with them and we do not give bribes to our partners as a way of influencing. Likewise do the Danish family Planning Association under no circumstances accept bribery in order to promote the implementation of activities. We base our cooperation with partner organizations on mutual ownership, accountability, participation, equality, harmonization, and alignment.

5. Nepotism and favoritism

We will not favor friends, family or other personal relations in recruitment, procurement, aid delivery or other situations.

Nepotism is favoritism toward relatives and friends. For instance, offering friends or family members a contract, despite the fact that there are others who are better qualified and willing to perform the job, or offering higher earnings and other benefits to employees who have a personal relation to the management. To avoid favoritism and nepotism in procurement we follow DFPA's "Procurement Manual". In recruitment at DFPA general transparent procedures are followed in order to identify the best candidate. It is important to underline that if conflicts of interests are handled, it can in some cases be acceptable to hire/collaborate with family or friends.

6. Gifts

We will not give or receive, directly or indirectly, any gift or other favor that may

influence the exercise of our function, performance of duty or other ways of possibly harming DFPA.

Gifts are defined as but not limited to: Services, travel, entertainment, material things or favors. In order to respect local traditions and conventional hospitality minor gifts are accepted. The value of an acceptable gift varies in different countries. Cash gifts are never accepted. All employees of DFPA and our partners are expected to show good judgment and when in doubt, contact their superior. A rule of thumb is that a gift should never influence your independent judgment and that one should share the gifts with colleagues, if possible.

3. Complaint Mechanisms

DFPA will take a stand on those cases of conflict of interest which may be difficult for an individual to decide. If a volunteer, employee, leader or member of the Management Board in DFPA or in a partner organisation discovers a case of corruption, this must be reported through the reporting system, described below. It is also possible to make contact if there is any suspicion, rumour or doubt as regards a case of corruption. A reporting form should in that case be completed and sent to complaint@sexogsamfund.dk.

DFPA has appointed a standing anti-corruption committee, which receives complaints. The committee consists of two employees, appointed by the liaison committee and a representative of the Management Board, appointed by the Board. The committee sits for one year at a time and members can be reappointed. The Head of the Management Board, departmental leaders and employees who work with the finances of the association and payments cannot be represented in the committee. The standing committee automatically receives copies of all mails sent to complaint@sexogsamfund.dk.

On the basis of the reported complaints, the committee evaluate whether an investigation committee should be appointed. The task of the committee will in the first instance be to ensure that persons involved in the complaint are not involved in dealing with the complaint and that those dealing with the complaint are not disqualified. Furthermore, it will be the task of the committee to take a decision whether the case should be dealt with further and also to inform the person who made the complaint about the result of the decisions taken.

If complaints do not involve leaders or members of the Management Board at DFPA, the complaint should to start with be dealt with by the Secretariat of DFPA and be reported to the Management Board. If the complaint involves leaders in DFPA, the complaint should be dealt with by the Management Board. If the complaint involves both leaders and the Management Board at DFPA, the committee has the authority to appoint an impartial investigation committee. The investiga-

tion committee can consist of a member of the anti-corruption committee, a controller from DFPA or external experts, e.g. the accountant of DFPA.

The reported complaint will be treated confidentially and with respect for the person making the report and the person(s) or organisations, about whom there is suspicion. Anonymous reports are not accepted. All cases of corruption must be reported to the standing anti-corruption committee, including cases which have been investigated locally in the partner country or cases which have a risk of personal safety.

Cases of corruption can end in dismissal and notification to the police, or other types of sanctions, if it becomes clear that the law has been violated. Donors will be advised, in case an investigation is commenced.

4. Publication

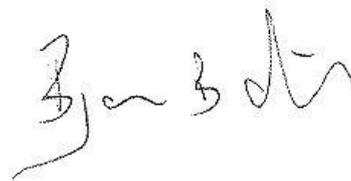
DFPA wishes to have an open policy regarding our practice for finances and accounting. Cases of corruption, or cases where an investigation has taken place due to a suspicion of corruption will be published on the homepage of the association. The anti-corruption policy is publically available on the homepage.

Treated by the Management Board of the Danish Family Planning Association on 6th June 2011

Came into effect on 12th September 2011



Chairman
Christian Graugaard



General Secretary
Bjarne B. Christensen