

# NPA Anti-Corruption Policy



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### 1. *Purpose of this policy*

NPA will encounter the risk of corruption in all operating environments, and all teams must take proportionate measures to prevent, detect and respond to it.

Corruption can threaten the safety and security of an organisation and is one of the main obstacles for positive development in fragile and poor countries. Corruption within the organisation may damage our work, reputation, and the morale of our staff and partners. Fighting corruption within NPA requires strong internal controls and relevant training.

This policy is established to outline

- NPA's definition and position on corruption
- Scope, roles and responsibilities
- NPA's procedures and guidelines that will assist in preventing corruption

### 2. *NPA's definition and position on Anti-Corruption*

- NPA defines corruption as: **the abuse of entrusted power for private benefit**. This includes both financial and non-financial benefits.
- NPA will not tolerate corruption in any form, and actively works to prevent, avoid and detect it through internal procedures.
- NPA will react promptly when corruption is suspected or has occurred.
- NPA is committed to transparency in all our work and to being accountable to all internal and external stakeholders.
- NPA encourages open discussions about corruption in the organisation.

### 3. *Scope of Policy*

This policy applies to all NPA staff, -managers, -board members, consultants, subcontractors, volunteers and any other organisations doing business with NPA

Partners are required to follow a zero tolerance policy and must adhere to this policy if they do not have their own policy of suitable standard

For the purpose of this document these groups are collectively referred to hereafter as "NPA Stakeholders".

The effectiveness of this policy depends on commitment from all NPA staff, managers, board members and partners to protect NPA's environment and resources.

#### *4. Duty to report misconduct*

All NPA stakeholders who becomes aware of possible corruption or breaches of the Code of Conduct or Conflict of Interest policy committed by NPA staff, -managers, -board members, cooperating partners, consultants, subcontractors, volunteers and any other organisations doing business with NPA, must report suspicions immediately through one of the following channels:

1. Line Manager or any trusted senior NPA manager in Country Office or at Head Office
2. HR teams in Country Office or at Head Office
3. Department Anti-Corruption Focal Point
4. Directly to the NPA Anti-Corruption Group: [acg@npaid.org](mailto:acg@npaid.org)
5. Whistleblowing channel on: [www.folkehjelp.no](http://www.folkehjelp.no) or [www.npaid.org](http://www.npaid.org)

#### *Protection of reporters and whistleblowers*

There will be no negative consequences to any NPA Stakeholder who confidentially reports reasonably held suspicions. Victimising or deterring staff from reporting suspicions will be treated as a disciplinary matter. Equally, staff found to abuse the process by raising malicious allegations will also be subjected to disciplinary action.

It is the responsibility of all managers to take reasonable steps to protect those who report suspicions.

#### *5. NPA's Anti-Corruption procedures and guidelines*

NPA is subject to requirements established under Norwegian law alongside other relevant national legislation, where stricter. NPA will act in accordance with all applicable legislation, professional and ethical requirements including relevant donors' regulations and procedures.

#### **The following documents have been developed to help implement this policy:**

- Anti-corruption procedure: reporting and case handling procedure
- Anti-corruption guidelines for detecting, preventing and investigating corruption
- NPA Routines for notifying censurable conditions (whistleblowing)
- Training materials

The documents shall

- assist managers, staff and cooperating partners to better understand the overall threats, what to look out for and how to apply correct control measures throughout the organisation
- provide information on how to handle corruption when it occurs
- provide necessary training material to support NPA's Anti-Corruption work

These documents are mandatory reading for Line Managers and staff working in support functions, both in country programmes and at Head Office, including Finance, Logistics, Security, HR, Compliance and IT.

## *6. Roles and Responsibilities*

The roles and responsibilities for implementing this policy are as follows:

### **NPA Board**

- Reviews and monitors the implementation of NPA's Anti-Corruption Policy.
- Ensures that reasonable steps are taken to prevent fraud and corruption of NPA's funds.
- Acts with integrity in line with this policy, and maintains the right tone at the top to foster an anti-corruption culture.

### **NPA Senior Management Team (Secretary General, Deputy Secretary General and Department Directors)**

- Owns NPA's Anti-corruption work
- Approves, oversees and implements NPA's Anti-Corruption Policy.
- Approves Anti-corruption procedures and templates.
- Ensures a proper understanding and compliance throughout the organisation.
- Ensures that adequate resources are allocated to tackle the risk of fraud and corruption.
- Ensures that corruption risks are regularly discussed and evaluated in Senior Management Team meetings.
- Acts with integrity in line with this policy, and maintains the right tone at the top to foster an anti-corruption culture.

### **NPA Anti-Corruption Group (ACG)**

- Keeps track of the status of reported cases.
- Maintains and updates the Anti-Corruption Policy, procedures and Case Processing System.
- Reports on the status of reported cases to the Senior Management Team and Board.
- Has an advisory role in relation to the progress of the cases and must assure an adequate scope and quality of the investigation and -report.
- A member of the ACG must be consulted prior to approval of all investigation terms of reference (TOR).
- Evaluates and decides in case of potential Conflict of interest
- Is final decision maker on the final conclusion of cases

### **NPA Department Directors**

- Responsible for the implementation of the Anti-Corruption Policy and - procedures in their respective departments.
- Appoint an **Anti-Corruption Focal Point**.
- Ensure that corruption risks are included within departmental risk management work.
- Ensure that proportionate and adequate measures to mitigate the risk of corruption are applied to the work of their department.

- Drive the implementation of the Anti-Corruption Policy and procedures listed in this document in their department.
- Facilitate an effective response to incidents in line with NPA's Anti-Corruption reporting and case handling procedure.

### **NPA Anti-Corruption Focal Points**

- Oversee the adherence to NPA's Anti-Corruption reporting and case handling procedure in their respective department.
- Report new incidents to the ACG.
- Approve investigations terms of reference.
- Update the ACG on the status of ongoing investigations.
- Carry out communication with donors (or coordinate with the person in the Department responsible for Donor notifications).

### **NPA Country Directors**

- Country managers are responsible for the handling and investigation of (alleged) cases of corruption according to NPA's Anti-corruption reporting and case handling procedure.
- Ensure that corruption risks are included as part of the country risk management.
- Ensure that proportionate and adequate measures to mitigate corruption risk are applied to the work of their country office.
- Drive the implementation of the Anti-Corruption Policy and procedures in their country.
- Facilitate an effective response to incidents in line with NPA's Anti-Corruption reporting and case handling procedure.
- Ensure implementation of post-investigation action plans.
- Acts with integrity in line with this policy, and maintains the right tone at the top to foster an anti-corruption culture.

### **NPA Line Managers**

- Foster an understanding and culture where corruption is not tolerated.
- Ensure that the procedures and regulations outlined in NPA's Anti-Corruption Policy and other related documents are followed within their respective areas of responsibility.
- Ensure the staff they manage receive Anti-Corruption training at a level appropriate to their need.
- Acts with integrity in line with this policy, and maintains the right tone at the top to foster an anti-corruption culture.

### **All NPA Staff and Volunteers**

- Must commit to zero-tolerance of corruption.
- Understand and comply with this policy.
- Adhere to controls and procedures put in place to prevent corruption.
- Must report all suspicions of corruption.
- Must co-operate with investigations as required.

### **NPA Cooperating Partners and other Stakeholders not mentioned above**

- Must adhere to this policy if they do not have their own policy of suitable standard and have effective control procedures in place to reduce the opportunity of corruption.
- Respond to and investigate all reported suspicions of corruption.
- Must report any suspicions of corruption involving NPA funds to NPA as required by this policy and the Partner Agreement or other NPA contract.

### **NPA Human Resources**

- Must advise on investigation procedures where NPA staff have been accused of carrying out corruption.

- Responsible for Code of Conduct, Conflict of Interest and Duty of Care policies.

### *7. Associated Policies and Procedures*

**The following list includes other regulations and procedures relevant for preventing corruption:**

- Code of Conduct
- Conflict of Interest
- Duty of care
- Finance Handbook
- Logistics Handbook
- HR Handbook
- Compliance Guidelines
- Internal and External audits
- Donor Agreements and associated guidelines

This list is not exhaustive and other policies may also be developed/updated which are of relevance.

### *8. Review*

This policy is subject to regular review, as a minimum every three years or within that period as required by legislation or experience.