

CARITAS Anti-corruption policy

Adopted by Caritas Management Group, Oslo, September 2017.

Introduction

Caritas Norway is accountable for all funds it receives to improve the lives of often poor and marginalised people and local communities around the world. While these communities often are vulnerable to mismanagement and corrupt practices, as a value-based organisation we acknowledge the right of every person to be protected against such practices. We therefore promote responsible funds management in respect of all stakeholders, including donors, partners, employees and suppliers, with the aim to achieve best possible effects for the end-beneficiaries.

Caritas Norway as part of Caritas Internationalis

- Caritas Norway, as a member of Caritas Internationalis, is part to the International Non-Governmental Organisations' Accountability Charter, promoting the principles of transparency and accountability.
- We also adhere to Caritas Internationalis Management Standards, developed to promote ethical behaviour, good governance, sound financial management, accountability, and stakeholder involvement.

How is corruption defined by Caritas Norway?

- Corruption is defined by Caritas as all abuse of power, money or position for illegitimate personal or group benefits.
- This includes all forms of economic corruption, such as bribes, embezzlement, extortion, kickbacks and fraud.
- It also covers all forms of nepotism and illegitimate favouritism of groups or employees based on ethnicity, religion, gender, political affiliation or other identity.
- This list is not exhaustive and does not mean that something not listed here is allowed.

What is Caritas Norway's position on corruption (Zero-tolerance)?

- Caritas Norway practices a zero-tolerance policy on corruption.
- We are aware that corruption takes place in all societies, including the Church, work actively to prevent corruption, and react with a clear position and concrete action when corruption is discovered.

Who does this policy apply to?

- All Caritas Norway's employees must commit to this anti-corruption policy, and are not allowed to be involved in any corrupt practices as defined in this policy. Caritas Norway management has a responsibility to adhere to and promote this policy.
- We select partners and suppliers that share and comply with this zero-tolerance policy, and will promote discussion and understanding of this position with partners when necessary.

Caritas measures to avoid corruption

Dissemination

- Caritas Norway will actively promote its anti-corruption policy and related documents to all employees, partners, donors and suppliers.

- These documents are available on Caritas Norway's web-site and other relevant communications platforms.
- We will actively present and discuss this policy in all relevant forums we take part in.

Formal commitment in writing

- Every employee must commit to this anti-corruption policy by signing on it confirming that they have read and understood it. The signed declaration will be kept in the personnel folder of each staff member.
- Caritas Norway's partners are expected to have similar policies, and must sign their policy in conjunction with the signing of the partner-agreement.
- Direct suppliers to Caritas Norway must complete the form Ethical Standards for Suppliers-Self-declaration and Caritas Norway Declaration of Good Conduct. They are expected to have anti-corruption policies and to share these with Caritas Norway upon request. Our partners are responsible to ensure that their suppliers have such policies, but we reserve the right to verify this.

Training

- New employees of Caritas Norway will be given training in existing anti-corruption policies and practices during their inception phase
- Existing employees will be given refresher courses every two years.
- Partners are expected to offer such training to their own employees. Caritas Norway will provide partners capacity building in anti-corruption and training if necessary.

Mainstreaming anti-corruption in management procedures

- Caritas Norway's management must ensure the development of systems, structures practices and culture that promotes trust and eliminates corruption.
- Anti-corruption work will be mainstreamed in all management procedures.

Caritas warning channels and procedures

Who has a duty to report (to management, donors, partners)?

- Employees or others representing Caritas are encouraged to react and report immediately at any possible corrupt practices by anyone involved in or with Caritas.
- This may be done anonymously.

Where to report suspicion of corrupt practices?

- Whistle-blowing reports by employees or Caritas Norway partners, in the first instance be channelled to one of the roles designated to deal with such matter, if these are not affected by the report:
 - Line-Management or any Senior Caritas Management
 - Appointed non-management staff representatives (anti-corruption focal point)
 - HR adviser (employees only)
- As a secondary option, Caritas Norway has established a whistle blowing portal, where reports can be filed anonymously and actions will be taken depending on the nature of the report.
- The portal can be found at this address: www.caritas.no
- Caritas Norway will immediately report substantial allegations of corrupt practices towards Caritas Norway partners as required to the Control Unit in Norad and MFA, or similar mechanisms with any other donor.

Caritas reaction in case of suspected or verified incompliance

Who may CARITAS react towards?

- Caritas Norway has the duty to react on corrupt practices or suspected corrupt practices by its own employees.
- We reserve the right to react on corrupt practices or suspected corrupt practices by our partners and supplier.

Duty to investigate (and involve law enforcement authorities)

- Caritas Norway practices the principle of “Duty to investigate” whereby all reported cases or suspected cases of corruption will be duly investigated.
- We will draw upon relevant external competence and/or authorities to investigate such cases (s.a. auditors)
- Caritas Norway will report to the national law enforcement authorities all cases where breach of law is suspected.
- In the case of suspected corruption or corruption under the responsibility of partners, Caritas Norway will only intervene directly if the partner do not take pertinent action within reasonable time.

Duty to suspend (staff contract, partnership contract, supplier contract)

- Caritas Norway practices the principle of “duty to suspend”, whereby we will suspend any employee, partner or supplier from their role with Caritas Norway subject to investigation as described under Duty to investigate, until such investigation confirm corrupt practices or wrongful actions.
- We expect our partners to practice this principle, and we will only react if such measures are not taken within reasonable time.

Duty to sanction in case of verification

In the cases where corrupt practices have been proven, Caritas Norway reserves the right to demand:

- Repayment of misused funds
- Cancellation of contract with relevant partners
- Dismissal of Caritas Norway staff involved in the case
- Report the case to relevant authorities
- Report the case to Caritas Internationalis

Caritas Norway’s tools for compliance

Caritas has several documents and tools to support the anti-corruption work. The organisation is aiming to establish a comprehensive risk management system to support the anti-corruption policy.

Internal documents

Document name
Caritas Norway anti-corruption policy
Caritas Norway’s Anti-Corruption Code of Conduct
Procurement Guidelines of Caritas Norway
Ethical Standards for Suppliers- Self-declaration
Caritas Norway Declaration of Good Conduct

Document name
Audit instructions from Caritas Norway's auditor to local auditor
Auditors checklist
Caritas Norway's partner assessment tool
Caritas Norway partnership contract
Minimum partner requirements
Personnel handbook for Caritas Norway
Briva project management handbook
Caritas Norway and partner' Project documents
Caritas Norway Yearly Report

External reference documents

Document name
CIMS Common Standards
CIMS Self-assessment
Caritas Internationalis Guiding values and principles
Caritas Internationalis Statues and Rules
Caritas Internationalis Partnership Guiding Principles
Caritas Internationalis Code of Ethics
Caritas Internationalis Child Protection Policy Framework
SPHERE Humanitarian Charter
ICRC/IFRC/NGO Code of Conduct

Main tools for Caritas anti-corruption work towards partners and projects

Document name	Comment
Project budgets and plans	Annual
Annual local external audits	Annual
Caritas Norway audits of partner projects	Annual
Management letters	Annually and follow-up
Caritas Norway meet local partner and auditor	Annually
Caritas Norway conducts anti-corruption dialogue with partner	Annually
Sharing travel reports internally and with donors	Regularly
Auditor's check list/Mango health checks	Annually
Mid-term reviews conducted by externals	Half way in projects
External Evaluations conducted by externals	End of projects
Organisational reviews of partners	Every 4 years
Caritas Norway's Anti-corruption training for employees and partners	Standard to be produced and focal point appointed (controller)
Participation in anti-corruption networks	Controller
Membership in Innsamlingskontrollen	Promotes transparency