

ELFCN Anti-Corruption Policy¹ (the original document is the Norwegian version)

Last update: December 2023

Introduction

This document must be understood in relation to ELFCN's Code of Conduct.

God calls the worldwide church community, of which the ELFCN and local partners are part of, to fight unfair power structures, inequality, discrimination of the poor, and other forms of injustice. God is a God who will empower the powerless and enable justice for the oppressed.

Corruption is commonly defined as "the abuse of power for private gain" (Transparency International). Corruption can take form in one or several ways: Bribery, collusion, embezzlement, facilitation payments, fraud and nepotism (definitions included at the end of this policy document).

Accountable stewardship of resources and the environment is closely linked to positions of leadership and responsibility as there is a moral obligation to take care of each other as well as creation in a respectful manner in which helpful structures and transparency is key. To combat corruption effectively, the ELFCN staff and local partners must act responsibly and with integrity.

Objective

The ELFCN mission department's overall goal is to reach the least reached with the gospel of Christ. As a Christian denomination it is of utmost importance to be His light in the world through demonstrating integrity and transparency in all that we do. This anti – corruption policy is part of that in order to ensure good stewardship of the resources entrusted us, often in the forms of gifts by private people as well as donations from churches etc.

All ELFCN staff and local partners are required to use prudent judgment to make decisions and choices with utmost integrity, in accordance with this anti-corruption policy and the ELFCN mission department's Code of Conduct.

Scope

This Anti-Corruption policy applies to all employees of the ELFCN's mission department, volunteers who represent ELFCN's mission department as well as consultants working for ELFCN's mission department. We also expect all our partners to prioritize anti-corruption in their work, on a policy level as well as on a practical level. The ELFCN prohibits all staff from practicing any form of corruption as described under "Definitions", at the end of this document.

Responsibility

The ELFCN has the overall responsibility of the implementation of the present Anti-Corruption Policy. The mission leader ensures that all critical cases are handled and reported appropriately, and that staff is regularly reminded and updated on the content of this document.

The ELFCN md staff, volunteers representing the ELFCN's mission department ~~md~~ and consultants working for the ELFCN are responsible for being familiar with, and personally adhering to the Anti-Corruption Policy. They are also responsible for raising concerns or using whistleblowing channels to report any observations of breach of the Anti-Corruption Policy. Whistleblowing is further described

¹ This document is Digni's Anti-Corruption Policy that is adjusted, and some places re-written, to fit ELFCN mission department, march 2019. This document must be understood in relation to ELFCN md's code of conduct.

under "Definitions". The ELFCN mission department's partners are responsible for defining their own policies, management routines and practices within the standards set out in this policy.

The ELFCN mission department's approach to combating corruption

The ELFCN has a holistic approach to corruption, focusing on three levels: Prevention, Detection and Response.

Prevention

The ELFCN mission department's leadership prioritises combating corruption in its strategic thinking, in relations to employees, volunteers and partners. The ELFCN mission department's leader and employees strive towards accountability and transparency (for example, by signing the Code of Conduct). The ELFCN prioritises raising awareness by confronting corruption directly and openly, and the ELFCN encourages partners to apply this approach.

The ELFCN mission department ~~me~~ is committed to keep routines and procedures up to date to ensure key control mechanisms remain effective. The ELFCN mission department contributes to enhancing partner staff's competence in financial management and awareness of corruption risks, with an emphasis on the partner who receives Norad funds. ELFCN staff and partners' staff are encouraged to take the practical Anti- Corruption course designed by Wycliffe with Digni's input.

The ELFCN mission department ~~me~~ makes it a priority to ensure that conflicts of interest do not arise. Any instances of offering or soliciting a bribe or facilitation payments will be treated with no tolerance. The ELFCN's mission department prohibits gifts, hospitality or expenses that could affect or be perceived as affecting decision making and/or be a cover for bribery. Receiving gifts may create situations placing an individual in a conflict of interest.

Detection

From experience, the following are the most common ways in which corruption is detected, particularly in the Norad funded projects:

- Objective analyses of project reports (financial and narrative in coordination)
- Information received through whistleblowing or complaints channels
- Assessments and Evaluations
- External and internal audit
- Project visits

A combination of the above usually forms the basis of detections.

According to global surveys, most corruption cases are revealed through "whistleblowing". This may be in the form of direct information from an individual or group who has observed irregularities. The ELFCN takes a firm stance in protecting whistleblowers or those raising concerns against any form of retaliation or revenge.

Response

The ELFCN has procedures in place in order to act swiftly and responsibly upon receiving reports of suspected corruption or abuse of power. All such information is registered, followed through and treated confidentially.

All reported suspicions or knowledge of incidents are followed up according to the ELFCN's mission department procedures. This includes the following key steps:

- An Action Team is set up for immediate follow – up and a thorough assessment of the situation.
- A log is created to record the case step by step, including correspondence and reports received.
- For Norad/Digni supported projects, the ELFCN will alert Digni, and discuss how to proceed. Digni provides guidance to their own staff and members in the form of practical

questions to members reporting incidents as well as a suggested work plan for handling cases. In accordance with Digni's agreement with Norad, all cases that entail a reasonable suspicion, will be reported to Norad's Fraud Unit. Norad's Fraud Unit will inform Digni of further desired action and keep in close contact with Digni's Action Team until the case is concluded. Digni's internal routines ensure follow up of all suspected cases of corruption, regardless of how Norad's Fraud Unit responds. If considered necessary due to the seriousness of the case, a forensic audit will be commissioned. The ELFCN's mission department ~~and~~ will be in close dialogue with Digni if a corruption case occurs and take necessary action.

Learning and transparency

The ELFCN's mission department ~~and~~ recognises the value of learning from actual cases. Each case provides unique examples of how control mechanisms and other routines have failed or contributed to detect the incident of mismanagement. After each case, the ELFCN will ask their teams or their partner who have experienced the corruption, to document new routines as a preventative action against similar cases. The CEO and the action team will according to the seriousness of the case, decide how to follow up and for how long.

Integrity when receiving support

The ELFCN's mission department and/or partner organisations may seek or be offered support (financial or other) from governmental donors, private donors, organisations or churches. Before accepting such support, there should be an assessment of whether the supporting relationship will result in any compromise in relation to ELFCN's core values, specified through ELFCN's Code of Conduct and other policies. In the event of support resulting in a compromise with ELFCN's core values, the support shall not be accepted. There cannot be any personal conflicts of interest connected to support given. In situations where a conflict of interest arises, the individuals in question shall withdraw from any decision-making process.

Differences in laws and cultural norms

There may be situations in which standpoints in this policy are challenged. However, the ELFCN expects all partners to act according to the standards set out in this Anti – Corruption Policy document. When gifts are offered from a group as a form of cultural acceptance and gratefulness, they should be handled with thankfulness, respect and sensitivity to cultural norms. However, the receiving partner needs to inform their line managers or superiors.

Taking action if you suspect corruption

The ELFCN's mission department encourages all employees and partners to report suspected breaches of the Anti – Corruption Policy, also known as whistleblowing, to their line manager or the next in line of service when the line manager is the subject of suspicion. Alternatively, whistleblowing may also be done by contacting the leader in the worker's union, FriMaf (this applies to members only), or through ELFCN's email, set up for whistleblowing cases only: varsling@frikirken.no

Definitions

- Integrity is the quality of being honest and having strong moral principles that you refuse to change (Cambridge University Press dictionary).
- Corruption is "obtaining improper advantage by virtue of one's position" (translated from Norwegian law). This advantage can be misused to commit fraud, embezzle funds or obtain personal favour.
- The following are terms used in connection with corruption:
- *Bribery*: The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take

the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.).

- *Collusion*: A secret agreement between parties, in the public and/or private sector, to conspire to commit actions aimed to deceive or commit fraud with the objective of illicit financial gain.
- *Conflict of interest*: A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or can be perceived to influence a person's decision. The person then experiences a conflict between the interest of the organisation's priorities and his or her personal interest.
- *Embezzlement*: When a person holding office in an institution, organisation or company dishonestly and illegally appropriates, uses or traffics the funds and goods they have been entrusted for personal enrichment or other activities.
- *Facilitation payments*: A small unofficial payment, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
- *Fraud*: To cheat. The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). Countries consider such offences to be criminal or a violation of civil law.
- *Nepotism*: Form of favouritism based on acquaintances and familiar relationships whereby someone in an official position exploits his or her power and authority to provide a job or favour to a family member or friend, even though he or she may not be qualified or deserving.
- *Solicitation*: The act of a person asking, ordering or enticing someone else to commit bribery or another crime.
- *Whistleblowing*: Reporting or informing of concerns about corrupt behaviour (see list above), criminal offence, someone's health and safety or covering up breach of policies. Whistleblowing may be done at any time about an incident that happened in the past, is happening now, or is believed to happen in the near future.

References

External

<https://www.transparency.org/glossary/> <https://www.norad.no/en/front/about-norad/whistleblowing/>

Internal, Digni

<http://digni.no/en/our-work/anti-corruption/>

Anti-corruption course (Digni/Wycliffe): <http://digni.no/en/antikorrupsjonskurs/>

Dignis governing documents and guidelines:

- Policy for trosbasert tilnærming til rettigheter
- Guidelines for handling financial and non-financial irregularities
- Relevant questions in cases of irregularities (guideline for members)

Internal ELFCN md documents related to this document

- Code of conduct