



DEACONESS FOUNDATION'S ANTI-CORRUPTION POLICY FOR INTERNATIONAL WORK

1. Code of Conduct (CoC) as part of cooperation and project agreements

- Deaconess Foundation's (DF) CoC highlights human dignity, respect of human rights as well as non-discrimination.
- This is an attachment to complete DF's CoC regarding its international cooperation.
- DF goes through the CoC as well as the anti-corruption policy with its partner organizations and other relevant stakeholders.
- The partner organization, including all its employees, commits to DF's CoC and its attachments when signing the cooperation/project agreement. When hiring new employees to the relevant projects, the partner organization must ensure that the employees have familiarized and committed themselves to DF's CoC and attached policies.

2. Implementing the Anti-Corruption Policy

- DF has zero-tolerance towards corruption in all forms. With its actions, DF aims to actively detect and prevent corruption. Corruption may take many forms, i.e. bribery, favoritism or fraud. It should also be noted that corruption can include gaining non-financial benefits through mismanagement or misuse of power. DF uses the Finnish MFA's *Anti-corruption Handbook for development practitioners* as a guideline to prevent corruption in development cooperation. As attachments to the Partner agreements, copies of the handbook are also distributed to Partner Organizations.
- DF acknowledges different context it works in. Corruption may happen anywhere but the risks and means vary depending on the context. DF recognizes this and aims to gather context knowledge on local manners to enhance understanding of the risks.
- In the beginning of new activities, the partner organization will be requested to estimate if the activities include any special risks, including corruption. Discussions will be held between DF and partner organizations as part of risk management. If there are special risks, risk levels will be determined as well as relevant mitigation measures. It will also be asked for the partner to pay attention to special risks when reporting as well as to contact DF immediately if any doubts of misbehavior occur. In addition, as part of risk management, discussions on safeguarding and anti-corruption will be held with partner organizations.
- DF organizes a training/workshop on safeguarding and anti-corruption to its partner organizations.
- DF pays attention to Partner Organizations' financial monitoring and reporting capacities and if needed, offers trainings and support to develop the system more reliable and comprehensive. In addition to yearly monitoring trips by DF, external certified audit companies audit each project yearly. Depending on a



project and donor regulations, either local or Finnish procurement laws shall be applied.

- **3. Deaconess Foundation's Complaints Mechanism, CM**
- The Deaconess Foundation has a [Complaints Mechanism](#), which is also to be used by all the international Partner Organizations, stakeholders and project participants.
- DF's local partner organizations are encouraged to create their own Complaints Mechanisms (CM).
 - If the has its own CM in use, the complaints regarding partner organization and its actions will be predominantly made through organization's own CM. However, all serious complaints (sexual abuse and harassment, violence and corruption) regarding the partner organization and its staff should be done through the DF's CM.
 - The partner organization's CM's functionality will be monitored annually amongst other project monitoring and the functionality will be reported in annual project reports.
- DF has a specific CM Team which receives all complaints, including those concerning DF's international projects and their staff. If the partner organization has a CM of their own, only serious complaints will be handled in DF.
 - The Team investigates the backgrounds of the complaints and will act actively according to the defined process.
 - The complaint can be made anonymously or with a name. The complaints are being encouraged to be left with a name, since it is not possible to inform the anonymous complainant about the progress of the investigation process and anonymous complaints are also more difficult to investigate.
- Informing about the Complaints Mechanism
 - As part of the trainings to the partner organization, informing the beneficiaries and other stakeholders of the project
 - Different communication channels in a local language: bulletin boards, brochures and social media
- Complaints can be made
 - From decisions or other actions, incl. corruption, which violate CoC and those policies and principles DF and its partner organization are committed to in cooperation/project agreement
 - DF's or partner organization's staff's unethical behaviour
 - Unethical behavior of beneficiaries or other stakeholders involved in the project
 - By Partner organization's employees, project stakeholders, beneficiaries or any other person related to DF's international projects.
- Complaints shall not be made



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- On false premises.
- In an attempt to harm or damage DF, Partner organization or persons involved.
- In case of a confirmed or suspected breach of this Anti-Corruption Policy, the Finnish Ministry of Foreign Affairs shall also be immediately notified through the Ministry's own reporting [channel](#) either by the DF or the Partner Organization.