

## Needs Assessment for IATI Advisory Services among Civil Society Organisations – The Ugandan case

### 1. Purpose of the Needs Assessment

#### Background Information

Operationalising our commitments to the Grand Bargain under workstream #1 and honouring our Charter4Change signature, Caritas Denmark in early 2017 published for the first time our data through IATI. The exercise is regarded as on-going, as this is a learning process. One of the first obstacles encountered is related to the fact that Caritas Denmark implements programmes through local partner organisations. This means that the financial chains cannot be traced to the end receivers unless the implementing partners publish their data as well. Due to the high numbers of local partners, this would be very resource demanding and time consuming should Caritas Denmark accompany all partners through the process of publishing programme data through the IATI registry.

A particular concern in this regard is ensuring the quality of the data delivered from these many sources, as poor quality data might be an even less attractive option than no data at all. Hence, for Caritas Denmark to honour our international commitments, cost-efficient ways to support local partners in publishing their data are required.

Based on this mini-study of local partner needs, Caritas Denmark will design an approach to provide IATI Advisory Services, which will be piloted in Uganda in 2019. The pilot will aim to build a permanent in-country capacity (possibly through private sector service providers) to allow the IATI Advisory Services to become available to all other CSOs beyond Caritas Denmark partners. The learning from this pilot is expected to be instrumental globally for IATI publishers and other stakeholders committed towards aid transparency, who are facing the same challenges, and are motivated to build IATI capacity elsewhere.

To Caritas Denmark, a significant element in this initiative is that it will allow local CSOs to report data *on a par* with international NGOs giving them the same advantages as others to demonstrate results to donors and other interested stakeholders.

#### Programme Context

Currently only five local CSOs in Uganda are publishing their data through IATI. Considering that 261 IATI publishers globally have reported to have activities in the country, there must be a large group of local CSOs not publishing data through IATI, who are in fact implementing activities with funding from IATI publishers. These figures imply that the need for IATI Advisory Services locally could be considerable.

A few initiatives towards local capacity development related to IATI are ongoing in Uganda. These include *EyeOpenerWorks* in Kampala, who provides IATI guidance for the partners of the Netherlands Embassy. Their lead consultant will in October 2018 look into the interest among private sector service providers in receiving training that would enable them to offer IATI Advisory Services to CSOs. Based on these consultations and on the mini-study described in this ToR, possibilities for coordinated efforts will be considered.

Other ongoing efforts include (but may not be limited to) Oxfam US which has organised IATI workshops in Uganda (possibly focussing on using IATI data for advocacy). Globally, Akvo ([www.akvo.org](http://www.akvo.org)) has trained partners of the Netherlands embassies in Mali, Benin and Mozambique, and Data4Development might have done something related as well. To avoid duplication and coordinate with other relevant initiatives as much as possible, this mini-study should seek to identify all ongoing efforts towards local IATI capacity development in Uganda.

Given the many IATI publishers reporting to have activities in Uganda and the number of already ongoing initiatives, there is something to build on in Uganda. This makes it an appropriate country to select for a pilot. Nevertheless, a challenge identified during preliminary consultations with Caritas Denmark partners in Uganda, is the shrinking space for civil society experienced now and the concerns related to transparency embedded in this situation for civil society actors.

### **Objectives of the Mini-Study**

Overall objective: To assess the need among Ugandan Civil Society Organisations for IATI advisory services. Immediate objectives:

- A. To identify the motivation and expectations of selected CSOs towards publishing data through IATI.
- B. To describe potential gaps in the inhouse capacity of selected CSOs for publishing data through IATI and consider the specific requirements raised for relevant approaches for IATI advisory services.
- C. To establish the concerns related to transparency in a context where space for civil society is shrinking and recommend solutions for concern free (though still meaningful) IATI publishing.
- D. To list all ongoing efforts towards local IATI capacity development in Uganda.

## **2. Scope of the Mini-Study**

### **Study Design and Methodology**

The Overall objective will be answered by analysis of the data and information collected in relation to each of the four Immediate objectives, as the need for advisory services depends upon the interest, gaps, challenges and already existing options available to and experienced by the Ugandan CSOs.

Immediate objective A-C will be addressed through semi-structured interviews with 15 selected local CSOs. Four of these will comprise the Caritas Denmark's partners; Caritas Uganda, Community Integrated Development Initiatives (CIDI), Central Archdiocesan Province Caritas

Association (CAPCA), and Eastern Archdiocesan Development Network (EADEN). The remaining 11 will be identified by the Consultant through analysis of recent IATI publications for activities taking place in Uganda based on the two criteria (also applying for Caritas Denmark's partners) 1) that they do not already publish data and 2) that they implement activities with funding from IATI publishers<sup>1</sup>.

Immediate objective D will be answered through consultation with the stakeholders involved in the initiatives already identified in this ToR. Information will be collected on the already on-going initiatives, and these stakeholder will be consulted on their knowledge of other ongoing initiatives or initiatives in the pipeline.

### **Tasks of the Consultant**

- Identify the CSOs not already selected.
- Contact and arrange meetings with the 15 CSOs.
- Prepare a checklist or questionnaire for the semi-structured interviews that covers the data and information to be collected for immediate objective A-C.
- Conduct 15 semi-structured interviews with the local CSOs.
- Analyse the data and information collected and draw conclusions.
- Contact and consult the stakeholders involved in the already on-going initiatives identified in this ToR.
- Write a report addressing the four Immediate objectives and the Overall objective and share with Caritas Denmark and the 15 CSOs for their comments.
- Integrate applicable comments and prepare the final report.

### **3. Deliverables and key out puts**

A draft report and a final report, with relevant comments of involved stakeholders incorporated. After finalising the assignment, the Consultant will be available for presenting his/her findings at relevant fora and to interested parties in Uganda and elsewhere. This will be at an hourly rate agreed prior to signing of contract for this mini-study, and only on the conditions that all travel expenditures are covered and the date is convenient for the Consultant.

### **4. Ethical considerations**

The consultant is expected in his/her work to comply with the Caritas Denmark Ethical Code, the Caritas Internationalis Child Protection Policy, and the Caritas Denmark anti-Corruption Policy (documents attached to this ToR).

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<sup>1</sup> Caritas Denmark is awaiting clarification from Cafod and Cordaid on whether the remaining 11 partners should be selected among their partners.

## **5. Expected Qualifications of the Consultant**

The Consultant must have comprehensive knowledge of the IATI standard and considerable experience with publishing IATI data. It will be considered a major advantage that the Consultant has previous records of working in Uganda or similar context with local CSOs.

## **6. Work plan and Time Frame**

Data collection and information gathering is expected to commence by early November 2018 and take approximately two weeks. A 1<sup>st</sup> draft report should be available and shared with all involved parties by December 10<sup>th</sup> 2018. On December 13<sup>th</sup>, the findings should be presented by the Consultant at a venue to be identified in Kampala for all involved parties, who will have the opportunity to comment. The deadline for providing comments to the Consultant per mail will be on December 14<sup>th</sup> 2018, and the deadline for final draft report is December 31<sup>st</sup> 2018.

## **7. Budget and Terms of payment**

The costs of the study will be established by the Consultant in the Expression of Interest (EoI) and paid directly by Caritas Denmark. Upon signing of contract, Caritas Denmark will pay the Consultant 30% of the fee and 100% of the estimated costs, while the remaining 70% of the fee will be paid upon delivery of the final approved study report.

## **8. Submission of Expression of Interest**

This ToR will be shared in the IATI community by posting on the [discuss.iatistandard.org](http://discuss.iatistandard.org), and all interested parties invited to submit an Expression of Interest (EoI) to Programme Coordinator Maj Forum with Caritas Denmark ([mfo@caritas.dk](mailto:mfo@caritas.dk)) by November 4<sup>th</sup> 2018. The EoI should not exceed 1 page, should describe the relevant qualifications of the Consultant and the key questions to be raised with the CSOs, as well as inform of the costs of the study. Based on the received EoIs, Caritas Denmark will select the proposal obtaining the best score related to the following five criteria:

- Adequate interpretation of the assignment.
- A reasonable cost range.
- Qualifications of the consultant, when it comes to:
  - o Knowledge of the IATI standard.
  - o Experience with publishing IATI data.
  - o Previous records of working in Uganda or similar context with local CSOs.

### Annexes:

- 1) Caritas Denmark Ethical Code
- 2) Caritas Internationalis Child Protection Policy
- 3) Caritas Denmark Anti-Corruption Policy

# Annex 1

## CARITAS DENMARK

### ETHICAL CODE

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The Ethical Code is in line with Caritas Denmark's Values, Vision and Mission. As a Catholic organization, it is our fundamental view that every human being is unique and created in God's image. Thereby all human beings are of equal value, no matter who they are, what they believe in or under which circumstances they live.

The personal conduct of anyone representing Caritas Denmark is expected to demonstrate respect for human dignity and universal rights.

Those representing the organization should possess a high degree of personal integrity, reliability and credibility and are obliged to act in compliance with the standards set out in this Ethical Code. Through defining the standards of conduct and acceptable behavior, the Code protects the organization, its representatives and those, which Caritas Denmark works with and for.

#### SCOPE OF THE CODE

The Ethical Code applies to all those associated with Caritas Denmark, including paid staff, volunteers and board members. On occasions, others will be asked to comply, for example consultants. For the purposes of this document, anyone bound by the Code is referred to as staff.

Managers have a particular responsibility in promoting and upholding the Code. They shall ensure that staff understands and works within the Code. They shall be role models in relation to expected behaviours.

The Ethical Code apply to staff behavior during professional duty hours, including official journey. The staff evidently has both a professional role and a private life; however, external perception may not always make the same distinction, and on certain occasions behavior during leisure hours may be evaluated against the Ethical Code. Especially during professional journeys, one may also during leisure time be conceived as a staff member and one's behavior thereby affects Caritas Denmark's reputation.

#### THE ETHICAL CODE

Caritas Denmark's Ethical Code includes the following principles:

1. VALUES, PROFESSIONAL ETHICS AND BEHAVIOR
  - Staff are expected to act professionally and in accordance with Caritas Denmark's Values, Vision and Mission

- Staff will act in good faith and treat other people with dignity and respect
- Staff will demonstrate respect for all human rights and challenge discrimination and exploitation, e.g. CI's Child Protection Policy
- Staff will work against misuse and neglect of any kind and prevent and oppose corruption in any form
- Staff shall be sensitive to local customs and culture and actively demonstrate respect as long as it is not in conflict with Caritas Denmark's values
- Caritas Denmark values and respects the right of all to freely choose and practice their faith and has no desire to impose any specific religious belief on staff or others
- Staff must bear in mind local sensitivities when practicing their own religious belief
- When handling data and information staff will uphold confidentiality in a manner consistent with general data protection principles
- Staff shall intervene to protect others from harm to an extent, which is considered possible and reasonable from a security point of view in the specific context

## 2. CONFLICTS OF INTEREST, COERCION, GIFTS AND BENEFITS

- Staff may never use the positions of power conferred by their roles as Caritas Denmark staff to exert pressure, obtain benefits or enhance personal gain – economically or otherwise
- Staff will declare any personal, family, friendly or similar interest, which may potentially or actually impact the work and give rise to suspected incapacity or nepotism – for example in relation to procurement or employment
- Staff will under no circumstances accept from partners, contractors, authorities or beneficiaries any benefits, bribes or other forms of personal enrichment
- Staff may not personally accept services or gifts - neither from beneficiaries, nor from suppliers, authorities, partner organizations or others. Small symbolic tokens of appreciation may be received if refusal to accept would offend local hospitality, and provided that management is subsequently informed

## 3. PERSONAL CONDUCT

- Staff shall observe all local laws in the country in which they are working
- The carrying of weapons is prohibited on Caritas Denmark's domain, including in vehicles
- Consumption of alcohol during working hours is only allowed during special, official occasions and in a quantum which does not affect the ability to work
- Staff must not possess or be under the influence of narcotics
- The sexual conduct of staff must not bring Caritas Denmark into ill repute or affect the role for which a staff member is employed. During professional stay there must be no kind of sexual relation to any person under the age of 18 or to a person, who receives assistance from Caritas Denmark
- Staff shall avoid any kind of relation, which can be perceived as taking advantage of a position of power or be suspected, that goods or services are exchanged with sexual or other benefits. Any suspicion of such a relationship shall be reported to the management

- Staff will not use the organization's computers to access illegal services or pornographic material

## **REPORTING**

Every member of staff has a duty immediately to report any suspicion of concerns regarding breaches of this code. Reporting will be treated in confidence and the reporter be protected, provided concerns are raised in good faith. Deliberate false allegations, however, may have consequences according to employment law. Concerns shall be raised with the Head of Administration, orally or in writing and with full details and, if available, evidence.

Reporting from external stakeholders, partners, consultants or persons in program countries who receive help from Caritas Denmark happens through a special complaints mechanism on Caritas Denmark's website. Caritas' *Complaints Policy* describes the complaints mechanism and is available on the website.

## **EMPLOYMENT STATUS**

The Ethical Code is an integrated part of any employment and contract with consultants. Anyone, employed with Caritas or contracting with Caritas on consulting services, is obliged to familiarize and comply with the Ethical Code.

Violation of the Ethical Code will be thoroughly investigated, and in view of circumstances, it may have consequences according to Danish employment law.

## **PARTNERSHIPS**

The Ethical Code is not formally binding for employees of partner organizations. When entering into partnerships, Caritas Denmark demands that the management of the partner organization adheres to the principles expressed in the code. The partner organizations is encouraged to develop its own code of conduct if no such exists.

## **MONITORING**

The Head of Administration in Caritas Denmark is responsible for the Ethical Code, including monitoring and review as required.

There may be personal behavior, which is not within the definition above, nevertheless is considered unethical and harmful to Caritas Denmark's reputation. Also such behavior shall be brought to the attention of the Head of Administration in order to determine, whether it gives rise to changes in the Ethical Code.

***Approved by the Board of Caritas Denmark 1st September 2016***

## 3

**CORE STATEMENT**

Caritas recognises the personal dignity and rights of children towards whom it has a special responsibility and duty of care and respect. Caritas, and all its staff and volunteers, undertake to create a safe environment for children and young people and to prevent their physical, sexual or emotional abuse.

For the purposes of this policy, Caritas regards children and young people as those who are under the age of 18.

**Commitment to Caritas Core Values**

Caritas expects all staff and volunteers to be committed to and guided by the following fundamental values and principles of the Caritas Confederation:

Caritas derives its being and inspiration from the witness of Christian Scripture and a living tradition of Catholic social teaching.

Caritas strives to uphold the dignity of the human person at all times.

The vision of Caritas Internationalis is a civilisation of love.  
It is a world:

- which reflects the Reign of God, where justice, peace, truth, freedom and solidarity prevail
- in which the dignity of the human person, made in the image of God, is paramount
- in which exclusion, discrimination, violence, intolerance and dehumanising poverty are no more
- where the goods of the earth are shared by all
- where all creation is cherished and held in trust for the common good of future generations
- where all people, especially the poorest, the marginalised and the oppressed, find hope and are empowered to come to the fullness of their humanity as part of a global community.

*(Caritas Internationalis Strategic Plan, 1999)*



**Part One: About You**

Name: .....

Your role in Caritas: .....

Details of any other organisation involved: .....

Your relationship to the child or young persons concerned: .....

**Part Two: About the Child/Young Person(s)**

Name(s): .....

Sex: .....

Age: .....

Address: .....

Who does the child or young person live with? .....

**Part Three: About Your Concern**

How did you come to have a concern: was abuse observed or suspected?  
.....

Was an allegation made? Did a child disclose abuse?  
.....

Date, time and place of any incident(s):  
.....

Nature of concern/allegation:  
.....

Observations made by you (e.g., child's emotional state, any physical evidence):  
.....

Write down exactly what the child said, and what you said:  
.....

Any other relevant information? (e.g., disability, language)  
.....

Were other children involved or aware?  
.....

Have you reported this to parents or caregivers or any other child protection personnel or agencies?  
.....

Time and date of reporting:  
.....

Person(s) to whom report was made:  
.....

Advice given:  
.....

Action taken:  
.....

# 1 **CODE OF CONDUCT** to protect children and young people from abuse and sexual exploitation

## **Preamble**

Caritas commits itself to creating and maintaining an environment which promotes its core values and prevents abuse and sexual exploitation. Caritas employees and volunteers are expected to contribute to building a harmonious workplace based on team spirit, mutual respect and understanding. All staff members are expected to uphold the dignity of beneficiaries served by Caritas organisations by ensuring that their personal and professional conduct is of the highest standard at all times.

Caritas Internationalis strongly condemns all kinds of abuse and sexual exploitation, especially towards its beneficiaries.

Abuse occurs when adults or other children hurt children or young people under the age of 18, either physically or in some other way. Sexual abuse occurs if a child or young person is pressured or forced to take part in any kind of sexual activity, whether or not the child is aware of, or consents to, what is happening. Sexual abuse includes incest, rape and fondling. It may also include non-contact activities such as showing pornography or internet-based activity. Sexual abuse may involve siblings or other family members, or persons outside the family.

1. Abuse and sexual exploitation constitute acts of gross misconduct and are therefore grounds for termination of employment. All relevant legal steps should be taken corresponding to the legal and social conditions of the local situation.
2. Exchange of money, employment, goods, assistance or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
3. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not an excuse.
4. Where a Caritas employee or volunteer develops serious concerns regarding abuse or sexual exploitation she/he must report such concerns to the appropriate body within the Caritas concerned and local legal authorities where appropriate.
5. Caritas employees or volunteers may not engage in any form of harassment, discrimination, physical or verbal abuse, intimidation, favouritism or exploitative sexual relations.
6. Caritas employees and volunteers are expected to behave in accordance with Caritas values.

Signed by...../Date.....

I have carefully read the Caritas Code of Conduct and discussed its contents with my supervisor and/or colleagues in order to understand it clearly. I must comply with the Core Values of Caritas and I am aware that Caritas expects me to uphold at all times the standards of behaviour described in the Code of Conduct above. I also understand that disciplinary measures and legal steps will be taken in case of non-compliance.



## Simple Dos and Don'ts

THERE ARE SOME SIMPLE RULES AND PROCEDURES THAT WILL MINIMISE THE RISK OF AN INCIDENT OCCURRING OR BEING ALLEGED. MOST OF THESE ARE COMMON SENSE AND WILL ALREADY BE FOLLOWED, BUT IT IS IMPORTANT THAT STAFF AND VOLUNTEERS SPECIFICALLY CHECK THAT THEY ARE BEING IMPLEMENTED IN ANY EVENT WHICH INVOLVES CHILDREN OR YOUNG PEOPLE.

### Dos

- Treat everyone with respect, recognising their right to personal privacy
- Be aware of situations that may present risks and manage these
- Plan and organise any events involving children so that risks are minimised
- Recognise that caution is required in all one-on-one situations
- Provide access for children and young people to talk to others about any concerns they have
- Encourage young people and adults to feel comfortable enough to point out attitudes and behaviour they do not like
- Remember that someone else may misinterpret your actions, no matter how well intentioned

- Do not spend time alone with children – plan activities so that more than one person is present or, at least, other people are within sight and hearing
- Do not take children alone in a car, even for short journeys, unless this is unavoidable for safety reasons. If this is unavoidable, make sure an adult caretaker or another member of staff is aware it is happening
- Avoid inappropriate physical or verbal contact with others
- Avoid being drawn into inappropriate attention-seeking behaviour, such as tantrums or crushes
- Avoid showing favouritism to any individual
- Never make suggestive remarks or gestures, even in fun
- Do not trivialise or exaggerate child abuse issues
- Do not rely on just your good name to protect you
- Do not believe “It could never happen to me”

### Don'ts

## Annex 3

### CARITAS DENMARK 2016

#### ANTI-CORRUPTION POLICY

Caritas wants to send a clear signal, both internally and externally, that there is zero tolerance of corruption. Caritas works in strategic partnership with the Ministry of Foreign Affairs and actively supports Danida's plan to combat corruption in the Danish aid management.

Corruption in all its forms is in its essence unethical and contrary to fundamental principles of Caritas's values. It is an unworthy relationship that violates others' legitimate rights and prevents the realization of the common good, e.g. in the form of legal rights. The management of entrusted resources must be done in honesty.

At the same time, all forms of corruption works against all that Caritas wants to promote: Empowering the poor and marginalized people, giving them desire, ability, and opportunity to break out of poverty and achieve a better life by their own means. Corruption affects the poor more than the rich, and is incompatible with the concepts of justice, democracy, good governance and sound and sustainable economic development.

Caritas works in countries that often have weak structures and are characterized by corruption to a greater or lesser degree. The solution is not to withdraw, but to strengthen local forces working to eliminate corruption and bring development. Corruption is one of several risks, and therefore we have a clear position on abuse and a clear and consistent way to counter it.

In line with the international declarations from Paris, Accra and Busan for effective development assistance Caritas is a supporter of openness about corruption and irregularities.

The policy for the prevention of corruption should also be considered in conjunction with the Code of Ethics for Caritas Denmark and Caritas Internationalis.

#### WHO IS COVERED BY ANTI-CORRUPTION POLICY?

The policy is aimed directly at the staff and volunteers of Caritas, and others who in various ways represent the organization. It is further directed at employees of the partner organizations which Caritas works with. It is Caritas's responsibility, together with partner organization's management, to ensure that they are well informed about the principles.

All those who in the following are collectively referred to as *Caritas's employees* are required to act in accordance with policy. The principles are to be enforced to the extent that it can be done without neglecting personal safety, and any violation of the principles is to be reported, investigated and sanctioned against.

#### WHAT IS CORRUPTION?

Caritas Denmark supports Transparency International's definition of corruption as the abuse of entrusted power for private gain, which meet the definition of Danish criminal law and international conventions. Specifically, the concept covers bribery, kickbacks, embezzlement, fraud, extortion and nepotism or equivalent.

Corruption covers both acceptance as well as payments of bribes and other forms of active or passive corrupt behavior. In the classical understanding corruption typically involves money in the form of undue

requirements or offers of payment to obtain a special service or benefit, but can also take other forms such as privileged access to a job or the like.

In Caritas, the corruption concept is understood in the broader sense, including other forms of deliberate misuse of entrusted funds - contrary to the agreement.

This policy is aimed at all forms of deliberate abuse, whether it occurs in Denmark or in the project country, and whether the particular form is specifically mentioned in the description or not.

The following 7 points describe some typical forms of corruption and can thus contribute to increased awareness of:

- **Conflicts of interest** arise in situations where a person has a private interest that could potentially affect or appear to influence the impartial and objective performance of his or her official duties. Private interests include benefits for oneself or one's family, relatives, friends and persons or organizations to which they have or have had business or political affiliation.
- **Bribery** is the offering, giving (active bribery), receiving, soliciting or accepting (passive corruption) something of value for the purpose of influencing an official's actions in the performance of his or her public and statutory tasks.
- **Extortion** occurs when someone illegally demands or receives money or property through the use of intimidation. Extortion can include threats of physical or material damage, threats to accuse someone of a crime or threats to reveal embarrassing information.
- **Fraud** is the use of deception in order to gain an advantage (financial or other advantage) to avoid an obligation or to be responsible for someone else's loss. This involves being deliberately dishonest, misleading or deceitful, rigging or acting under false pretense.
- **Embezzlement** is the misappropriation or misuse of property or funds legally entrusted to a person by virtue of his or her position.
- **Corruption in connection with gifts** covers cases where a gift or other financial benefit being offered, given, requested or received, with the expectation to get a favour in return. Gifts and hospitality may in itself be an expression of corrupt behavior. It can be used as a means of promoting corruption, or it may be perceived by others as corruption. Gifts include cash or assets given as gifts or political or charitable donations. Hospitality may include meals, hotel nights, flights, entertainment or sporting events.
- **Nepotism** is favouritism of family or friends without regard to their skills. Family and friends are treated favourably because of the close personal relationships rather than a professional and objective assessment of their skills and attributes.

## **PRINCIPLES FOR ANTI-CORRUPTION**

The following four principles are essential for Caritas employees' efforts against corruption:

1. Caritas's employees must maintain personal integrity, also in their daily work, to avoid relationships and situations where they in any way could be suspected of corruption. The employees are identified with Caritas and Danish foreign aid, which is to maintain the highest standards, also as an example for others.

2. Caritas employees must internally in the organizations they work in or cooperate with, work to prevent corruption as much as possible by ensuring clear rules and transparency in administration and continuously be aware of the risk of corruption and irregularities in the daily work.

3. Caritas employees should externally work to promote zero tolerance and eradicate corruption. This perspective must always be judged in a local context and be incorporated in planning and implementation of all activities.

4. Caritas's management has a special obligation to promote anti-corruption at all levels and consistently sanction against cases of corruption and irregularities. It is not acceptable to ignore a colleague or someone else's misuse of funds, and managers must always protect people who in good faith report suspicion of corruption.

## **REPORTING**

The policy is publicly available on the Caritas website so that other stakeholders - not least private contributors, donors and the beneficiaries - know these important principles. There should be no doubt that Caritas does its utmost to work against corruption and ensure that the donated money is used properly.

Complaints about violations of Caritas's anti-corruption policy is done via the Caritas website. "Policy for handling complaints" describes this complaints mechanism and is available on the website.

## **FOLLOW-UP**

Caritas Denmark's Head of Administration is responsible for the anti-corruption policy, including ongoing monitoring and review as needed.