	Hoffnungszeichen Sign of Hope e.V. Anti-Fraud and Anti-Corruption Policy	Revision: 03.00 Valid after: 01.04.2018 Review: 01.04.2020 Page: 1 of 3
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1. Introduction

Hoffnungszeichen | Sign of Hope e.V. (SoH) is an interdenominational human rights, relief and development organisation. Helping those in distress is the focus of our work across the world. Sign of Hope campaigns where human rights are being abused or threatened. Sign of Hope provides humanitarian aid in the form of disaster relief and emergency aid and is also involved in sustainable development cooperation based on the principle of ‘Helping People to Help Themselves’.

With a background of the Christian faith as a shared set of values and basic motivating factors, Sign of Hope is guided by the core values of empathy, charity and solidarity. The following quotation from Matthew 25, verse 40 illustrates the common core: ‘Truly, I say to you, as you did it to one of the least of these my brothers, you did it to me.’

The purpose of this policy is to ensure that all of SoH’s work is conducted in an honest and ethical manner. SoH takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, accountable and with integrity in all our business dealings and relationships.

2. Scope of Application

This policy applies globally to all SoH staff, board members, interns and volunteers as they carry out SoH business. It also covers attempts at or corrupt acts committed by external groups or individuals (e.g. implementing partners, contractors, suppliers, donors, local authorities and beneficiaries).

All references to ‘employees’ or ‘employment’ in this policy should be read as including the staff of implementing partners, suppliers, agents and volunteers. SoH reserves the right to terminate contracts with implementing partners, suppliers and agents if they breach the rules stipulated in this policy and SoH’s Code of Conduct.

The SoH Code of Conduct commits all staff to act in an ethical manner and to not accept gifts with a value of more than 40 EUR or any remuneration from governments, beneficiaries, partners, donors, suppliers and other persons, which have been offered to staff members as a result of their employment with SoH.

3. Definition


Corrupt behaviour is defined as the misuse of entrusted power for private gain. SoH rejects all forms of corrupt and unethical behaviour. Disciplinary measures can be taken against misconducting employees which may result in a termination of employment or the initiation of criminal proceedings.

Corrupt and unethical behaviour includes but is not limited to:

a) Paying or Offering a Bribe

– where an employee improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another person or body in order to influence their conduct in any way.

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Date		
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b) Receiving or Requesting a Bribe

– where an employee improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence the employee’s conduct in any way.

c) Receiving or paying a so called ‘Grease’ or ‘Facilitation’ payment

– where an employee improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway. For example: where a staff member of an implementing partner refuses to issue the required travel authorisations without a personal payment also being made.

d) Nepotism or Patronage

– where an employee improperly uses their employment to favour or materially benefit friends, relatives or other associates in some way. For example, through the awarding of contracts, jobs or other material advantages.

e) Embezzlement

– where an employee steals or misappropriates funds, property, resources or other assets placed in their trust or belonging to SoH or a connected organisation or individual. For example, an employee using building contractors who have been employed to work on a SoH project to work on their own personal property instead.

f) Receiving a so called ‘Kickback’ Payment

– where an employee improperly receives a share of funds or a commission from a supplier as a result of their involvement in a corrupted bid or tender process.

g) Collusion

– where an employee improperly colludes with others to circumvent, undermine or otherwise ignore SoH’s rules, policies or guidance. For example, where an employee tries to fix the amounts of a tender in order to bring it below a certain threshold which has been set by SoH.

h) Abuse of a Position of Trust


– where an employee improperly uses their position within SoH or a connected organisation to materially benefit themselves or any other party. For example, an employee accessing confidential material they are not entitled to or passing confidential information (such as the contents of a tender bid) to a third party.

4. Reporting

All SoH staff and volunteers have the duty to protect the assets of SoH from any form of corruption. Staff and volunteers must immediately report any suspicion of unethical behaviour or corruption to their next line manager or – should the line management itself be concerned or complicit – to the Ombudsperson (ombudsperson@sign-of-hope.org). Failure to report serious concerns of misconduct will be treated as complicity and a breach of the Code of Conduct and may result in disciplinary measures being taken.

Reporting and investigation procedures are explained in detail in the complaints & whistleblowing policy and investigation guideline.

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5. Implementation of this policy

5.1 Employees' contracts of employment must enable bribery and corruption to be dealt with firmly, but fairly, under disciplinary policies. Committing any form of corruption may be considered as gross misconduct and could lead to dismissal. Any deviation from this must be documented and approved jointly by the executive board of SoH. This documentation must state why the individual was not dismissed and what disciplinary action was taken.

5.2 Staff must declare to their line manager any possible conflict of interest (for example, a friend or family member working for a supplier, or the one who wrote the Terms of References is also applying for the job) that might leave them open to a suspicion of corruption. Where such a conflict of interest exists, the line manager should bring it to the attention of the relevant line manager (see complaints & whistleblowing policy).

5.3 Requirements and reporting obligations to prevent unethical behaviour and corruption are a key element of all partnership and project agreements signed between SoH and implementing partners. Partners are required to regularly report to SoH and take action against any corruption which occurs in their organisation and may affect the subgrant. All partners are required to establish adequate complaints mechanisms.

5.4 Suppliers and agents of SoH must act in accordance with this policy. Attempted corruption is as serious as the actual acts and will be treated in the same way under this policy.

5.5. A SoH complaints and whistleblowing policy must be in place with adequate investigation procedures.

6. Associated Policies

This policy is complementary to the sets of standards of behavior that all SoH employees are required to adhere to as stipulated in the SoH Code of Conduct as well as in the policy on protection from sexual exploitation and abuse and child protection. These policies go hand in hand with the complaints & whistleblowing policy.

The anti-fraud and anti-corruption policy shall be reviewed biannually.

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