

Questionnaire on the organisation's anti-corruption system

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Please rate the below statements as follows:

- 0 points: not applicable, no existing in our organisation
- 1 point: somewhat implemented in our organisation
- 2 points: fully implemented in our organisation

A Risk analysis	
Risk analysis of project work	
A1	<p>Our organization regularly conducts an analysis of the corruption risks of our project work.</p> <p>Background information: Corruption risks in terms of country, sectoral, partners and project risks are identified, analysed, listed and evaluated every year (e.g. high, medium, low risk).</p>
A2	<p>Our organization draws consequences for the daily project work from the analysis of the corruption risks.</p> <p>Background information: Due to the identified corruption risks in the project work, the organization takes measures to minimize them and regularly updates its anti-corruption system.</p>
Analysis of the own organisational risks	
A3	<p>Our organization regularly conducts an analysis of organizational risks.</p> <p>Background information: In the analysis of internal organizational risks, the operational business is examined – in particular in the field of procurement, contracts, and human resources.</p>
A4	<p>Our organization draws practical conclusions from the analysis and evaluation of internal organization risks.</p> <p>Background information: This risk analysis is part of a process that identifies, analyses and evaluates corruption risks, defines measures to minimize them and regularly updates the anti-corruption system.</p>
Total for A:	
B Values, principles, rules and regulations	
Values and principles of organization	
B1	<p>Our organization has written down our values and principles regarding anti-corruption.</p> <p>Background information: The organization has a code of conduct that explicitly defines values and principles and that provides guidelines for all employees. This code of conduct is evaluated / reviewed every three to five years.</p>
B2	<p>The supervisory board and the organisation's management publicly present and document their position towards anti-corruption.</p> <p>Background information: The supervisory body and the organisation's management declare that they are committed to the organisation's anti-corruption policy internally / externally at least twice a year. This is also documented.</p>
Code of conduct, rules and regulations rules for the implementation of values and principles	
B3	<p>Our organization has a code of conduct and implementing guidelines for the implementation of the organisation's values and principles.</p> <p>Background information: The rules explicitly address the various forms of corruption and describe processes (including reporting channels) and responsibilities (for handling corruption cases, for example). These rules also describe the position of the focal point for anti-corruption.</p>

B4	<p>Our rules are easily accessible at all times to the supervisory board, the organisation's management, employees, contracted staff and, if applicable, project partners.</p> <p>Background information: The rules are for all people easily / quickly available who need access. The rules are translated into several languages and can be accessed on the intranet and / or on the publicly accessible website.</p>
B5	<p>The rules are described in a clear, understandable and action-oriented manner for management, supervisory bodies, employees, contracted staff and, if applicable, project partners.</p> <p>Background information: The rules are formulated clearly and comprehensibly for all target groups. The rules can be easily understood by persons who are not familiar with the risks of corruption. They oriented towards action.</p>
B6	<p>The rules apply explicitly to all employees, the organisation's management and supervisory bodies. This is also documented in writing.</p> <p>Background information: These rules form the basis for integrity. Leadership and oversight bodies are an example of value-oriented behavior, both in words and actions, so that the rules of conduct and procedure can also be effective.</p>
Total for B:	
C Minimum requirements for the anti-corruption guidelines	
Reference to the risk analysis	
C1	<p>Our rules and regulations on anti-corruption reflect the most important results of the risk analysis.</p> <p>Background information: The rules and regulations on anti-corruption mention, for example, identified key risks in processes (e.g. conflict of interest).</p>
Zero tolerance	
C2	<p>The rules and regulations stipulate the requirement of zero tolerance of corruption.</p> <p>Background information: The rules and regulations fundamentally do not tolerate corruption. They offer concrete measures to be taken in the case of ethical conflicts (for example, in the case of threats to life and limb). To this end, they describe and justify exceptions to this requirement, but make them notifiable.</p>
Conflict of interest	
C3	<p>Our organization has rules on potential conflicts of interest that apply to employees as well as to the management and supervisory bodies.</p> <p>Background information: Conflicts of interest arise when personal interests, family relationships, and other attachments conflict with the interests of the organization. Conflicts of interest are defined for all hierarchical levels, examples of possible conflicts of interest are listed, and orientation for further action (ideally based on examples of desired behavior) is given.</p>
Hospitality	
C4	<p>Our organization has arrangements for giving and receiving gifts to ensure that such transactions are in good faith and not a pretext for bribery.</p> <p>Background information: The aim is to ensure that gift giving and receiving comply with organizational rules and that applicable laws are respected. The organization may choose one of the following options: (1) There are upper limits for exchanging gifts. If gifts are accepted for reasons of courtesy, regardless of value, this should be reported. (2) Gifts are approved by a higher authority. (3) All gifts are collected institutionally and used transparently within the organization.</p>
Facilitation payments	
C5	<p>Our organization has a scheme that explicitly prohibits facilitation payments.</p> <p>Background information: The scheme clearly prohibits facilitation payments – except in the event of danger to personal health and safety. In such cases, facilitation payments are documented.</p>
Total for C:	

D Processes and responsibilities	
Integration of anti-corruption into the organisation	
D1	<p>The Supervisory Board actively exercises its legal responsibility to develop, introduce and review the functioning of the organisational anti-corruption system (e.g. through internal / external auditing).</p> <p>Background information: The Supervisory Board has mandated the development of an anti-corruption system (for example through a team of internal and external experts) and entrusted the organisation's management with the task of implementing the anti-corruption system.</p>
D2	<p>Anti-corruption is anchored structurally and personally in your organization (for example, through an anti-corruption focal point).</p> <p>Background information: The Supervisory Board has specifically entrusted one of its members with the topic of anti-corruption. In addition, there is an anti-corruption focal point within the organization.</p>
D3	<p>The anti-corruption focal point has a clear job description.</p> <p>Background information: The most important tasks of an anti-corruption focal point ideally include: risk analysis and evaluation; preparation / further development of the organisation's rules and regulations (including values and principles); implementation of anti-corruption processes; consulting, enforcing, monitoring and control; training of all employees (including the organisation's management and supervisory board) and, if necessary, also the project partners; communication and reporting on anti-corruption.</p>
Staff recruitment and leadership in the organization	
D4	<p>Anti-corruption is integrated into the recruitment processes.</p> <p>Background information: In job interviews, the issue of anti-corruption is addressed, and the attitude of the organization made clear. Values and principles as well as rules and regulations on anti-corruption are an integral part of the employment contract.</p>
D5	<p>There is a regular rotation of staff in particularly sensitive positions (internal audit, procurement, remote management). This takes place every 3-5 years.</p> <p>Background information: Responsibilities are regularly swapped. The probability of detection increases if the area of responsibility is regularly assumed by other employees.</p>
Total for D:	
E Internal and external communication	
Internal communication	
E1	<p>The Board and the organisation's management support the anti-corruption agenda at all levels of the organization.</p> <p>Background information: Supervisory bodies and the organisation's management have repeatedly and internally / externally commented on the issues of corruption and clearly positioned themselves in the field of anti-corruption. This has happened at least twice in the last 6 months.</p>
E2	<p>There is a positive failure culture in our organization; i.e. errors are part of the organisational learning process and thus contribute to the systematic improvement and success of the anti-corruption system.</p> <p>Background information: The organizational culture enables an open and constructive discussion of corruption cases. Reporting on corruption are responded positively; clear cases of corruption are sanctioned; the organisation's own anti-corruption system (processes, responsibilities, training, information) is analysed regularly; required changes are clearly and openly discussed and necessary reforms implemented.</p>
External communication	
E3	<p>The management has some guidelines how to react to corruption press inquiries.</p> <p>Background information: The organisation's management has issued guidelines for press inquiries on corruption cases, in which the organisation's anti-corruption system is outlined; internal contact persons are listed; and language is defined.</p>

E4	<p>The key tasks and responsibilities of the anti-corruption focal point are communicated in a clearly visible manner on our homepage and in our annual report.</p> <p>Background information: The organization externally communicates anti-corruption. Values and principles, tasks and responsibilities of the anti-corruption focal point are online and are presented in the Annual Report.</p>
Total for E:	
F Trainings	
General training on anti-corruption	
F1	<p>There is an employee (for example the anti-corruption focal point) who is tasked with conducting / coordinating anti-corruption training sessions.</p> <p>Background information: An employee (such as the Anti-Corruption focal point) conducts anti-corruption training courses on his/her own or refers employees to training courses.</p>
F2	<p>Employees are regularly trained on anti-corruption.</p> <p>Background information: Anti-corruption training is a crucial element in strengthening personal and institutional integrity. Anti-corruption training can be offered separately or as part of a larger organization value and policy training program. The training on anti-corruption takes place regularly. The content is regularly adapted to latest developments.</p>
Special training on anti-corruption	
F3	<p>Our organization offers tailor-made anti-corruption training for employees in sensitive positions.</p> <p>Background information: The organization is obligated to implement a systematic program for the systematic handling of corruption for employees in sensitive positions. It adapts its training content to the respective different risks. Sensitive positions are those in which employees are particularly exposed to corruption risks. Functions with a high risk are z. B. marketing/fundraising, personnel and contract management and project management.</p>
Total for F:	
G Whistle-blowing system	
Reporting lines	
G1	<p>Our organization has provided all employees with comprehensive information on how and where they can request and receive help and advice regarding anti-corruption.</p> <p>Background information: Employees can contact a trained superior, the anti-corruption focal point, helplines or an external ombudsperson to obtain information about the organization's anti-corruption system.</p>
G2	<p>When whistle-blowers report concerns or suspected cases of corrupt activity, our organization has several well-known channels (e.g. Internet, telephone, personal) that are easily accessible and provide confidentiality and anonymity.</p> <p>Background information: The organization has several different channels for reporting suspicious corrupt activities by employees and / or project partners. Clear and appropriate reporting channels and responsibilities have been established. These include both internal and external, independent channels (online reporting system / hotline / ombudsperson), including the possibility of confidential or anonymous communication between the whistle-blower and the organization.</p>
G3	<p>The reporting channels are also available to beneficiaries.</p> <p>Background information: The reporting system is adapted to the project context, is available in all relevant languages and is easily accessible. Beneficiaries can access more than one reporting channel.</p>
Total for G:	

H Controls	
Ad hoc and regular controls	
H1	<p>The control measures ensure the effective implementation of the organisation's rules and regulations.</p> <p>Background information: The support staff in our organization is sufficiently qualified and properly equipped. There is a strict separation of staff working on projects and on financial reporting. The available resources correspond to the actual workload.</p>
H2	<p>There is a documented internal control system (ICS).</p> <p>Background information: The organization has a detailed description of the ICS processes and regular ICS reporting. The organisation's management and ICS officers coordinate and monitor controls. An action plan for regular and ad hoc controls exists.</p>
Internal Audit	
H3	<p>On behalf of the supervisory bodies, the auditor prepares a risk-oriented plan that outlines who should conduct when which kind of audit of which projects.</p> <p>Background information: The analysis of the corruption risks is the basis for drawing up the audit plan. The organisation ensures that the riskiest areas are examined.</p>
H4	<p>Our organization conducts an annual audit.</p> <p>Background information: Auditing is not only carried out in accordance with national laws. The Supervisory Board appoints an auditor and determines areas particularly to be audited. The external auditor is changed regularly (at least every five years). The auditor's recommendations feed into the organisation's anti-corruption system.</p>
Total for H:	
I Handling of corruption cases	
Protection of the whistle-blower	
I1	<p>Our organization has formal and comprehensive mechanisms to encourage whistle-blowers to report and to protect whistle-blowers.</p> <p>Background information: A whistle-blower is a person who internally or externally reports misconduct of the organization. There are various mechanisms that reduce or eliminate the fear of reporting misconduct; these include assurances that whistle-blowers will not be reprimanded; there is the possibility of anonymous reporting, or at least the obligation that those who receive a message, will ensure confidentiality of the whistle-blower's person. In addition, potential whistle-blowers should be aware that a report is being objectively reviewed.</p>
I2	<p>There is an obligation to protect the whistle-blower.</p> <p>Background information: The organization has committed not to discriminate against whistle-blowers who report bona fide about corrupt actions. In case management, individual work steps are checked for possible negative consequences for the whistle-blower; and disadvantages are avoided as far as possible. If circumstances permit, whistle-blowers should be informed about the organization's next steps to the extent that they can better protect themselves. Those involved in the case management strike a clear balance between the success of the investigator and the threat to the whistle-blower is made consciously and with care.</p>
Case management	
I3	<p>Corruption allegations are reported promptly, followed-up immediately, sanctioned, and uniformly documented; informants / whistle-blowers informed in a timely manner.</p> <p>Background information: Suspicious cases are reported promptly and examinations (special purpose audit, forensic audit) are initiated quickly by independent auditors. Examinations and test results are documented uniformly. There are sanctions for violations (or justified lack of sanctions). Whistle-blowers and affected persons will be informed promptly about the results.</p>

I4	<p>Our organization documents and applies sanctions (such as criminal charges, written warnings, dismissal, reimbursement) against employees and partners.</p> <p>Background information: There are clear rules about sanctions for proven corruption cases. Sanctions can include warnings, dismissal, asset recovery. The sanctions apply uniformly; the management decides on the extent of the enforcement of the sanctions.</p>
Total for I:	
J Evaluation and reporting	
J1	<p>Our organization has a clear, well-articulated plan to further develop anti-corruption over a period of time (anti-corruption agenda) – with clear responsibilities, tasks and deadlines.</p> <p>Background information: The organization has an anti-corruption agenda (annual plan), which is also monitored on an ongoing basis by the Supervisory Board, the organisation's management and / or the anti-corruption focal point.</p>
J2	<p>The case management is regularly evaluated with regard to the source of information, forms of corruption, and implemented sanctions – in order to the further develop the organisation's anti-corruption system.</p> <p>Background information: The case management is evaluated regularly; the results feed into the further development of the organization's anti-corruption system (i.e. into the risk analysis, rules and regulations, processes and responsibilities, internal and external communication, training, controls and case management). Regularly a "lessons learned" meeting is organized.</p>
J3	<p>Employees are regularly informed about the results of cases.</p> <p>Background information: Transparency is an essential element to further develop anti-corruption in the organisation. Feedback to employees encourages them to actively report cases and assist in the further development of the anti-corruption system.</p>
Total for J:	

Scoring

	Total points
Prevention	
A Risk management	8/
B Code of conduct and guidelines	12/
C Minimum requirements for the guidelines	10/
D Processes and responsibilities	10/
E Internal and external communication	8/
F Trainings	6/
Total Prevention	54
Detect	
G Whistle-blowing	6/
H Controls	8/
Total Detect	14/
React	
I Handling of corruption cases	8/
J Monitoring and evaluation	6/
Total React	14/
Total	82/

Classification

Over 70 points: Congratulations! Your organization has a functioning anti-corruption system that is constantly further developed.

Up to 60 points: Your organization has a good anti-corruption system, which can still be improved in some ways.

Up to 45 points: Your organization has an anti-corruption system that should be improved in some crucial ways. (Minimum requirement)

Up to 30 points: Your organization has significant risks in the area of anti-corruption.