

Anti-corruption policy

To be decided by	The Executive Board of RFSU
Type of document	Policy (applies to the whole organisation)
Overarching documents	Articles of Association / Ownership Directive
Revision	When needed, but at least every 5 years

Establishment and revision				
Version number	Date	Decision-making body	Author/Function	Type of audit
2	2024-06-06	FS	Chief Financial Officer	Revised
1	2016-12-09	FS		Established

1. Purpose and scope

RFSU has zero tolerance for corruption. The purpose of this policy is to clarify how RFSU works to **always prevent, never accept, always inform about and always act against corruption.**

The policy applies to all of RFSU and covers elected representatives, employees, volunteers, informants, trainees, consultants and anyone else who represents RFSU in any capacity. This includes all units within RFSU's organisation, such as the head office, clinics, local associations, companies, subsidiaries and foundations, but excludes individual members. RFSU also expects contractors, suppliers and partners to act in accordance with RFSU's anti-corruption policy when working with or representing RFSU.

This policy is part of the RFSU's work on internal control and ways of working, together with [the RFSU's Code of Conduct](#), [Whistleblowing Guidelines](#), [Child Protection Policy](#) and Purchasing and Procurement Policy. **The policy will be revised by 2029-06-06.**

2. Definition

Corruption hinders social, economic and political development, disproportionately affecting the most vulnerable. Corruption poses a direct threat to RFSU's values, our ability to work with a rights based approach and our ambition to contribute to a world where all people are free to decide over, and enjoy, their bodies and sexuality.

Corruption is the **abuse of entrusted power for personal gain**.¹ It can involve, for example, giving or receiving bribes, fraud, conflict of interest, embezzlement, extortion, favouritism,

¹ This definition comes from Transparency International: <https://www.transparency.org/en/what-is-corruption>

nepotism (corruption of friends) and sextortion² and certain other forms of sexual exploitation, abuse and harassment (SEAH). Corruption is not always about money - it can be about giving or receiving preferential treatment in tenders, recruitment or other processes.

Corruption can happen anywhere, involve anyone, and it usually happens in the shadows. The risk of corruption is particularly high in some of the environments where RFSU operates, such as in countries with weak authorities and institutions, and where respect for human rights and freedoms is limited. Corruption thrives where people cannot criticise, question decisions or participate in public discourse.

3. Roles and responsibilities

Responsibility	RFSU Executive Board	RFSU office & clinic	RFSU local organisations	RFSU companies
to be familiar with the content of this policy, and to be vigilant against corruption and report any suspected case.	The entire RFSU and each individual representative of RFSU Elected representatives, employees, volunteers, informants, trainees, consultants and anyone else who represents RFSU in any capacity. This includes all units within RFSU's organisation, such as the head office, clinics, local associations, companies, subsidiaries and foundations, but excludes individual members.			
to decide on and have overall responsibility for ensuring that everyone in RFSU acts in accordance with the policy.	Executive Board			
to ensure that internal anti-corruption control systems are in place; that everyone in their part of the organisation acts in accordance with the policy.	Executive Board	Secretary General, Heads of Division and Heads of Unit	Board of the local association	Corporate governance through shareholder directives
to investigate and act on suspected cases of corruption.	Chair of the Executive Board	Secretary General	Chair of the Board of local association & head of office	Chair of the Board & CEO
to ensure that new staff and board members at all levels of the RFSU are informed about this policy and what is expected of them.	Chair of the Executive Board	Heads of departments and units	Chair of the Board of local association & head of office	Chair of the Board & CEO
to update the policy as necessary (every 5 years).	Director of Finance and Operations & Chief Financial Officer			

² Sextortion is both a form of corruption and a form of gender-based violence perpetrated through sexual abuse, exploitation or harassment and occurs when a person abuses their position of power and offers a favour or benefit in exchange for sexual services. See EBA Report 2020:06.

4. RFSU's work against corruption

We take violations of the Anti-Corruption Policy seriously and, depending on the nature of the offence, it may lead to disciplinary action such as removal from office or dismissal.

All representatives of RFSU shall inform about suspicions that may be related to corruption, even those cases that seem unlikely, and regardless of the financial value. This includes sexual exploitation, abuse and harassment (SEAH)³ and all forms of child abuse and exploitation.⁴

Individuals can report suspicions by talking to their manager or chairperson, the Director of Finance and Operations or by using the whistleblowing function. Regardless of how the information is provided, we will treat it confidentially and with care.

Conflicts of interest and disqualification

Representatives of RFSU who have secondary employment or other commitments that involve, may involve or may be perceived as involving a conflict of interest or disqualification must report this to their superior (e.g. manager or chairperson). Conflict of interest refers to a situation where a representative of RFSU's private interests are contrary to, or risk being contrary to, RFSU's interests. Conflict of interest is a situation where a person in a decision-making position may not be able to make an objective decision.⁵

If a secondary occupation or other involvement involves a risk of conflict of interest, it cannot be maintained in parallel with an assignment for RFSU. In case of uncertainty, the chairperson or immediate superior should be consulted.

RFSU's elected representatives may not participate in discussions or decision-making concerning agreements or financial interests between RFSU and the elected representative, or other organisations where the elected representative holds a decision-making position. It is the responsibility of each elected representative to declare a conflict of interest in a given situation.

As a member of the *International Planned Parenthood Foundation (IPPF)*, RFSU is committed to being a transparent and accountable organisation. As part of this, all board members and members of the management team fill in a declaration of interest when they take up their position.

Gifts and hospitality

In relation to their work, RFSU representatives should not offer, solicit or accept personal gifts or other benefits that represent more than a symbolic value.⁶ Gifts in the form of money are prohibited, regardless of the amount. In certain contexts, it may be deemed inappropriate or offensive to decline a gift from for example a partner organisation. In such cases, RFSU representatives must use their judgement and resolve the situation to the best of their ability. Gifts received in such situations are the property of RFSU and should be kept (or consumed) in a common place.

When RFSU bears the costs of hospitality, they must be reasonable and, if the funding is part of a grant, in accordance with any regulations stipulated by the donor.

³ See the RFSU Code of Conduct (2022), point 2.

⁴ See the RFSU Child Protection Policy (2020).

⁵ For more information, see the glossary of [the Institute Against Corruption \(www.institutetmotmutor.se\)](http://www.institutetmotmutor.se)

⁶ In case of uncertainty about what "symbolic value" means, the chairperson or immediate superior should be consulted.

RFSU's international activities

Some of RFSU's international activities take place in countries where corruption is common. When RFSU makes financial contributions to partner organisations, we take a number of different measures to reduce the risk of corruption, for example:

- We assess the partner organisation's internal governance and control systems and policies. If we consider the systems to be inadequate, we identify improvement measures together with the partner.
- We carry out physical visits and spot checks at partners' premises to verify that rules and policies apply in practice.
- All grants are subject to an annual independent audit, and the auditor's observations are followed up by the RFSU.
- Our agreements with partner organisations set requirements for their internal control systems and their work against corruption. The agreements also clarify how suspected cases of corruption should be handled, and allow RFSU to take action such as cancelling the agreement and recovering money.

Whistleblowing

RFSU encourages everyone to report suspicions of corruption, serious risks or irregularities concerning our activities. We treat information about suspected corruption with care, protecting the identity of the whistleblower.

The whistleblower can choose to remain anonymous. A whistleblower who is open about his/her identity does not risk losing his/her job or suffering any kind of sanction or personal disadvantage as a result of his/her report. A person does not need to have proof of their suspicion to report it. However, no allegations may be made with malicious intent or with the knowledge that the allegation is false.

Information on how individuals can report corruption or other irregularities can be found on [the RFSU website](#) and in more detail in [the RFSU Whistleblowing Guidelines](#).

5. Actions in case of suspicion of corruption

In the event of suspected corruption, the RFSU Secretary General, or equivalent within RFSU's companies or local organisations, is informed, and assesses whether the information should be passed on to the Executive Board. RFSU immediately informs external funders if the corruption involves their funds.

In all cases of suspected corruption, RFSU follows a specific action plan. There are two different action plans for corruption within the RFSU and externally (e.g. within a partner organisation). Examples of actions are

- Conduct a specific external audit to obtain more information about the incident.
- Report to the police if there is a suspicion of a crime.
- Investigate whether there is cause to terminate the employment of staff or expel a member.
- Investigate whether there are grounds to terminate the cooperation with the partner organisation, terminate the agreement and/or claim a refund.

The RFSU always endeavours to recover funds lost through corruption.

If a case of suspected corruption involves sexual exploitation, abuse and harassment (SEAH) or child abuse or exploitation, RFSU applies the victim's perspective. This means that any action is taken with the needs of the victim at the centre and taking into account the victim's dignity, experiences, wishes, needs and rights. In addition, RFSU's Child Protection Policy (2020) governs how the organisation acts if there is suspicion of child abuse or exploitation.

6. Keeping the policy alive

Representatives of the RFSU shall be given the opportunity to participate in anti-corruption trainings or workshops on a regular basis.

Once a corruption case has been closed, the RFSU will organise an evaluation to identify lessons for the future. It is the responsibility of the RFSU's Director of Finance and Operations to initiate such a process.

The Director of Finance and Operations is also responsible for ensuring that this policy is relevant and updated. At least every five years, the Director shall initiate a review of the policy and, if necessary, make revisions that are decided by the Executive Board. The Executive Board may also choose to update the policy as necessary.