

EEB ANTI-CORRUPTION POLICY

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1. Anti-Corruption Policy

1.1 Policy Statement

The European Environmental Bureau (EEB) believes that good governance is fundamental to the successful development of the EEB as an organization as well as being inherently linked to its mission and values. The existence of an anticorruption policy will include a good regulatory framework that provides a sound structure for the management of the EEB's resources. Our anti-corruption approach encompasses the following elements:

- accountability;
- transparency;
- participation;
- equality;
- rule of law;
- capacity and competence;
- responsiveness to people's needs.

The EEB is committed to upholding the principles of good governance in the implementation of anti-corruption mechanisms. The principles of good governance support our overarching goals of promoting environmental justice, sustainable development and participatory democracy.

1.2 Scope of the Policy

The anti-corruption policy has been developed in order to give a clear signal to our staff, members, donors and the public to indicate our position regarding the issue of good governance. The anti-corruption policy seeks to ensure transparency and openness. The purpose of the policy is to:

- establish and maintain procedures for preventing, identifying, and managing any cases of corruption and mismanagement;
- ensure that staff understand and apply the anticorruption policy and the expectations.

2. Anti-Corruption Strategy

2.1 Roles and Responsibilities

Of the elements that threaten good governance, corruption is among the most destructive. Corruption and mismanagement can cripple socio-economic and environmentally sustainable development. The EEB adheres to a strict zero-tolerance policy on corruption. Coordination of actions serving to ensure good governance and prevent corruption and mismanagement form an integral part of our responsibilities. Specifically, the EEB will:

- tackle all instances of both high-level and low-level mismanagement and corruption with equal conviction;
- deploy resources to fight corruption in a targeted and efficient manner;
- respond quickly and professionally to indications of mismanagement and corruption;
- ensure sufficient anticorruption capabilities.

The EEB acknowledges that for the goal of good governance to be achieved, continuous determination and dedication at all levels is required.

2.2 Barriers to Good Governance

Corruption – the abuse of entrusted authority for private gain – represents a major obstacle to social/environmental justice and economic development. The EEB is strongly opposed to all forms of

corruption including bribery, embezzlement, fraud, extortion, favoritism, and nepotism. These elements run counter to the core values of the EEB, which has established solidarity to create new opportunities and to strengthen ties with the communities we serve.

Incidents of corruption or mismanagement will be tackled head-on as they are seen as a threat to the support of the best possible projects and hence the achievement of the best possible results. The EEB considers all those involved in implementing anti-corruption measures as having a responsibility to do their part with regards to the prevention and identification of cases of mismanagement, and the imposition of sanctions on those that are behind them.

2.3 Policy Procedure

The anticorruption policy consists of three elements – prevention, identification and action. This policy document outlines the procedures the EEB will implement over possible cases of mismanagement and corruption.

Prevention

The EEB acknowledges that the best way to tackle corruption is to prevent its occurrence. The EEB seeks to prevent corruption by having the following elements in place:

- educate staff and members about our anti-corruption policy;
- monitoring of programmes and projects;

Identification

The EEB will use a number of procedures and tools to verify information that may uncover potential mismanagement and corruption. The following components are promoted to enable the identification of irregularities:

- access to information regarding key project information, financial figures and grant application processes;
- use of internal project monitoring, including unannounced monitoring;
- pro-active review of receipts compared with project objectives.

Action

The EEB will work closely with respective person(s) and organization(s) to ensure the anti-corruption policy is upheld. It will review the situation on a case by case basis to ascertain the ramifications of any alleged injustice. In doing so, key action steps may result, including:

- Suspension of the employee while the nature of the allegations of mismanagement and corruption are reviewed,
- Forwarding the allegations to the authorities for further investigation;
- Seeking the removal of employees or agents in proven cases of corruption;
- Dissociating the EEB from any partner(s) involved in proven mismanagement and/or corruption of the financial mechanisms, including non-governmental organizations already barred by other donors.

3. Complaints Process

3.1 Scope of the Procedure

The purpose of the complaints procedure is to ensure that staff, members and the public wishing to complain or report irregularities regarding the implementation of the financial mechanisms have a simple means of doing so, that their complaint is handled with an open mind and in confidentiality, and that incidents of mismanagement and corruption are uncovered and corrected.

The complaints procedure applies where the nature of the complaint indicates a threat to the proper use of the financial mechanisms, or where mismanagement or corruption by those charged with managing the funds is alleged.

3.2 Members of the Public

Members of the public wishing to address their concerns regarding possible mismanagement or corruption of the financial mechanisms will be granted confidentiality. There will be no reprisal against members of the public who give information in good faith. Members of the public who suspect mismanagement or corruption, but are unsure of their case, are encouraged to share their concerns with the EEB or other agents responsible for the management of the financial mechanisms.

3.3 Complaints Handling

The procedure for complaints handling followed by the EEB will consist of, but is not limited to:

- designation by the EEB Secretary General of a person or persons assigned to review any complaints;¹
- written acknowledgement of the complaint or report of irregularities, including information on the actions that will be undertaken, together with a tentative timeline;
- involvement, as warranted and appropriate, of the EEB staff, Management Committee or external monitoring agents to review cases of alleged mismanagement of the financial mechanisms;
- action with all possible speed by all institutions involved in the review to provide an initial assessment of the issue and stop cases of mismanagement or corruption, or dismiss unsubstantiated allegations;
- in cases where allegations of corruption or mismanagement seem substantiated, provide written information to the Management Committee on the results of the review, the actions that will be taken as a result of the review, and information mechanisms should the result of the review not be satisfactory to the complainant;
- The EEB is under an obligation to inform those bodies who investigate and prosecute instances of mismanagement or corruption.

4. Project Management

4.1 Project Planning

¹ The Board considered that there should be two persons identified as points of contact in case one of those designated is the subject of a complaint and that the policy should indicate how a complainant should communicate with the points of contact and to those concerned. It mandated two Board members together with the Secretary General to prepare wording to reflect this. This step was delayed following the departure of one of the Board members from the Board and has yet to be done.

Requiring the inclusion of the principles of good governance within all project implementation and management activities contributes to the overall strength of a project and its purpose.

In managing projects, the principles of good governance should be at all stages of the project cycle. This document provides an outline to the Board, the Secretary General, all staff including those responsible for projects, members, the public and donors of the elements that the EEB will conduct in implementing, monitoring and evaluating quality projects which adhere to the principles of an anticorruption policy.

When developing the good governance framework of a project, a number of elements should be considered in order to give an indication of its adherence to these principles. There will be an absolute requirement that no projects are in any way contradictory to good governance or tolerating corruption.

4.2 Project Monitoring

In assessing and monitoring the implementation of projects the principles of anti-corruption/good governance will serve as a key reference point of reference. The success of any anti-corruption policy depends on thorough monitoring of the implementation of its underlying principles within the project.

5. Implementing Anti-Corruption Policy

This anti-corruption policy will be implemented in all aspects of the EEB's work.² This policy is an integral part of the mission and values adopted by the EEB. Consequently, we are committed to include the adherence to the principles of good governance/anti-corruption from project conceptualization to completion.

² The Board considered that there should be a clearer indication of how the policy will be applied. It mandated two Board members together with the Secretary General to prepare wording to reflect this. This step was delayed following the departure of one of the Board members from the Board and has yet to be done.