



Photo: Ibrahim  
Malla/IFRC

# The Swedish Red Cross' policy on the prevention of fraud and corruption

Adopted by the  
Management Board  
on 15 February  
2019

## INTRODUCTION

This policy describes what applies to the Swedish Red Cross as an organisation with regard to corruption and fraud and how we ensure our zero tolerance for all forms of fraud and corruption.

This policy applies to all elected officials, volunteers, employees, delegates, trainees, students, consultants, fee earners or others who have undertaken assignments for, or otherwise represent, the Swedish Red Cross.

in Sweden and/or abroad. In this policy they are referred to as Red Cross members. The policy also applies to the international cooperation the Swedish Red Cross has with other national societies and other parts of the Red Cross and Red Crescent Movement.

The Swedish Red Cross shall ensure that all parties are informed of the existence of this policy and its implications.

## POLICY COMMITMENTS

- We have a zero-tolerance approach to all forms of fraud and corruption.
- We always act on suspicions of fraud and corruption.
- We focus on prevention to counteract and detect fraud and corruption in a timely manner.
- We have external and internal audit functions in place.

## APPLICATION

The overall responsibility for the organisation living up to the policy lies with the Swedish Red Cross board and management team. The branch boards and regional councils are responsible for ensuring that activities at local level are conducted in line with the policy. Each operational manager is responsible for ensuring that there are relevant procedures and follow-up in place to ensure compliance with the policy.

All Red Cross members have a personal responsibility to act in accordance with this policy and to recognise and act on any breach of the policy.

The board of directors, circuit boards and management of the service organisation should set the tone, lead by example and promote a culture of fraud and corruption prevention. They are guided in their actions by the principle of 'zero tolerance'. They are also responsible for having procedures in place for the detection and prevention of fraud, corruption and other irregularities and for ensuring that systems are in place to prevent and deal with any cases. Suspected cases of corruption should be summarised and reported on an ongoing basis. Each function should be familiar with the types of irregularities that may occur in its area of responsibility and be alert to any irregularities.

The Board shall monitor the application of this policy by management and volunteers, including through the implementation of preventive measures. The Board is responsible for the detection and prevention of fraud, corruption and other irregularities that may be committed by the management and volunteers.

The Swedish Red Cross Code of Conduct and Guidelines for Countering Corruption and Fraud (forthcoming) provide guidance on how to interpret and apply this policy. It is the responsibility of all Red Cross members to be able to understand and apply the Code of Conduct.

The Swedish Red Cross has clear procedures for how to act in case of suspected corruption and fraud.

### Internal control

We have an independent internal audit function for circuits. The purpose of this audit is to monitor the management of the different circuits and the control activities applied. The focus is on compliance with internal regulations and aims to reduce the risks that local organisations may face. Internal audit carries out regular audits based on analyses of reported financial data from the circuits and can thus also detect fraud and corruption. Internal audit reports directly to the Monitoring Committee, a committee with a specific mandate appointed by the Board.

This internal audit works on behalf of the Head of the Organisational Development Department. In order to effectively perform its tasks, the internal audit must have free access to all information at the Swedish Red Cross that is relevant to its work. This includes all minutes, evaluations, follow-ups, payroll systems and accounting systems, etc. It can also mean participation in internal meetings and seminars. Documents and information submitted to internal audit for review must be handled confidentially and stored separately.

In the service organisation, there is ongoing work to control and monitor financial transactions such as salaries, purchases and travel expenses, including clear rules for authorisation and reconciliation.

### External control

We have an externally managed whistleblower function for reports. This function also includes protection for the reporter and the reporter's identity will be kept confidential. Suspicions that a person does not want to report to any chairperson, volunteer leader or manager, should be reported to the Claimdesk at email address [redcross@claimdesk.pwc.se](mailto:redcross@claimdesk.pwc.se) or by letter to Claimdesk, PricewaterhouseCoopers AB, 113 97 Stockholm.

We have an external audit of the financial management of civil service organisations both nationally and internationally. This audit is carried out by authorised auditors. Swedish Fundraising Control annually reviews that the organisations that have 90 accounts comply with the requirements established by Swedish Fundraising Control for these accounts. An important control activity is the Swedish Red Cross's reporting against the Swedish Fundraising Council's quality code. In connection with this, the Swedish Red Cross reviews the requirements imposed on internal control and summarises compliance with these requirements in a separate report.

### Preventive work

Our prevention efforts focus not only on systems and control functions, but also on individuals and their behaviour. For example, everyone in the civil service organisation must have received anti-corruption training. We have authorisation and signature rules for handling invoices etc. and internal authorisation and IT security rules and procedures. In connection with the annual business planning process, a risk analysis is also carried out, which is followed up quarterly in the coming year.

## Our intervention work

As a general rule, the Swedish Red Cross in case of a suspected offence. In the case of police reports in certain countries with uncertain legal systems or where there are no relevant laws, a case-by-case assessment is made.

In some situations, we may be aware of a possible risk of corruption, but still choose to carry out humanitarian operations with extra control, vigilance and follow-up.

If there is an offence, we act to ensure that all resources are returned and we take the utmost measures to ensure that this happens.

Our guiding principles for investigating suspected offences are independence and objectivity.

We are transparent within the Swedish Red Cross and with external stakeholders about our work against corruption and fraud and the cases we handle.

## OUR RESPONSIBILITY AS RED CROSS MEMBERS

Our policy and other governing documents on fraud and corruption contain clear statements against all forms of fraud and corruption. According to the Swedish Red Cross Code of Conduct, all Red Cross members must, among other things:

- **Combating all forms of fraud and corruption**  
You must not contribute to fraud and corruption. For example, you must not give or receive bribes in the form of money, gifts, sexual favours or other benefits to individuals or groups in exchange for services. This can be considered a bribe even if there is no intention for the donor to receive a benefit.  
However, if individuals or groups wish to show their appreciation in the form of flowers, chocolates or other commemorative gifts, the value must not exceed what is required by Swedish law.
- **Not abusing a position of trust**  
When working for the Swedish Red Cross, you may come into contact with people who are or feel they are dependent on you. This requires that you in all situations actively distance yourself from personal gain, act insightfully based on your position and that you always act in a way that inspires confidence. You must also not use your position to give undue advantage to others.

### Definitions

**Corruption** means using one's position to gain an undue advantage for one's own or another's benefit. This includes, for example, bribery. Corruption need not only lead to financial gain but can also involve to cause damage to the confidence or brand of the Swedish Red Cross.

**Fraud** involves deceptively inducing someone to perform an act or omission that results in profit for the offender and damage to the deceived person or someone in his or her place.

## REFERENCES

**About the whistleblowing function:** <https://rednet.redcross.se/var-forening/Styrdokument/Policy/Uppforandekod/>

**On internal control:** <https://rednet.redcross.se/var-forening/Styrdokument/Riktlinjer/Internkontroll/>

**Externally targeted information:** <https://www.redcross.se/om-oss/ekonomi/styrning-och-intern-kontroll/>