

ETHICAL GUIDELINES FOR CCC Members – UNCAC Coalition

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Purpose

The purpose of this document is to establish some Guidelines for integrity and ethical behaviour of the members of the UNCAC Coalition Coordination Committee (hereinafter referred to as CCC). It should serve to orient their decisions and behaviour in their role as CCC members.

CCC members should also lead by example for all Coalition members whenever they act and present themselves as Coalition members.

This is a living document and the guidelines will be updated as needed.

General Standards

1. The CCC is conscious of its mission and mandate, commits to live up to what it expects other actors to do; to act in a transparent and accountable manner; and to do so in full respect of the rights of its members and all individuals with whom it interacts.
2. Anyone representing and/or taking decisions on behalf of the UNCAC Coalition will always act based on the best interests of the organisation, and no individual associated with the CCC will use his/her position for personal benefit, for the benefit of friends or relatives, or to further any outside interests or personal agenda. This standard applies to all transactions and decisions irrespective of their nature.
3. These standards of integrity are also expected from paid staff and consultants of the Coalition.

Specific Standards

This section provides guidelines and measures to prevent and manage situations that may pose a risk to the integrity of the Coalition. They are not meant to be comprehensive and can be amended in the future.

General Principles

- CCC members are careful in their use of Coalition funds and resources. They will not take advantage of their position to profit from projects to be implemented by the Coalition. CCC members will make rational use of funds allocated to cover their travel, and will aim at avoiding waste and using Coalition resources for private purposes.
- CCC membership can't be used / instrumentalized for the interest of member organisations or CCC members. CCC members will avoid and properly manage conflict of interest situations.
- When representing the Coalition, including while travelling, CCC members should behave in a way that is respectful and ethical and protects the image and reputation of the Coalition.
- The Coalition practices a high level of transparency about its funding and partnerships and seeks to address potential or perceived conflicts of interests through proactive disclosure. Donors and partnerships are disclosed on the UNCAC-C website and in relevant publications.

PRINCIPLES/ SITUATIONS	MEASURES TO PREVENT AND MANAGE CONFLICT	MEASURES TO ADDRESS NON-COMPLIANCE
<p><u>A. Use of Coalition funds and resources</u></p> <p>CCC members do not take advantage of their position to profit from projects to be implemented by the Coalition.</p> <p>CCC members will make rational use of funds allocated to cover their travel, and will aim at avoiding waste and using Coalition resources for private purposes.</p> <p>CCC members will avoid “double claiming” per diems from both the Coalition and their own organisation or another sponsor for the same trip.</p>	<p>CCC members will not engage directly (personally) or indirectly (through member organisations, or others) in paid Coalition work without prior approval by the CCC.</p> <p>Upon election, CCC members will disclose the names of the organisations or entities, of any kind, in which they have a stake / vested interest in.</p> <p>Wherever feasible, adequate internal controls and the four-eyes principle are applied to authorize expenses by the Coalition.</p> <p>CCC members are expected to inform prior to their trip, if their travel will be covered in whole or part by another organisation. They should otherwise notify the Coalition so that they can either return the funds or have the funds deducted from their next reimbursement payment.</p> <p>The Coalition travel reimbursement form will include a box for those requesting reimbursement to tick that says ‘I confirm that I am not receiving reimbursement from any other organisation for these same costs’. Coalition reimbursements will not be processed without this confirmation.</p> <p>CCC members will strive to rationalise the Coalitions’ funds to the extent it is possible, for example by seeking other funders to cover Coalition-related travel.</p> <p>The Coordinator can add, as needed, other control measures. For example, set up control parameters for travel expenses, mileage rates, etc.</p>	<p>Based on the here and below described situations and scenarios, the CCC (or a designated sub-committee) may take measures to establish if compliance with the guidelines was violated, as well as measures to respond to violations in a proportional and adequate manner, including by:</p> <ul style="list-style-type: none"> ● Asking a CCC member for the reimbursement of expenses not used or misused; ● Issuing a written warning; ● (Temporary) suspension of CCC rights (until the situation is clarified) or termination of CCC membership; ● Informing the member’s organization about the CoI; ● Terminating membership in the UNCAC Coalition; ● Involving the association’s Comptrollers and/or external auditors or consultants to ensure full transparency and an independent investigation; ● Informing the UNCAC Coalition membership about the case; ● Issuing a public statement.
<p><u>B. Conflicts of interest (CoI)</u></p>	<p>Declare existence of an existing or potential conflicts of interests and</p>	

<p>CCC membership can't be used / instrumentalized for the interest of member organisations or CCC members. CCC members will avoid and properly manage conflict of interest situations.</p>	<p>refrain from participating in the decision.</p> <p>Establish a registry with specific information at the beginning of each term that would be relevant for establishing a CoI. Member's duty to update as necessary.</p> <p>Subject to CCC approval: Proactive publication of the vested interests, as declared in a conflict of interest form, on the Coalition website.</p>	
<p><u>C. Representing the UNCAC-C externally</u></p> <p>When representing the Coalition, including while travelling, CCC members should behave in a way that is respectful and ethical and protects the image and reputation of the Coalition.</p>	<p>Basic communication guidelines for CCC members.</p>	
<p><u>D. Transparency of UNCAC-C funding</u></p> <p>The Coalition practices a high level of transparency about its funding and partnerships and seeks to address potential or perceived conflicts of interests through proactive disclosure.</p>	<p>Subject to CCC approval, donors and partners the Coalition receives funding from, as well as the nature of the funding, are proactively released on the Coalition website.</p> <p>Donors as well as potential perceived conflicts of interest are highlighted in relevant publications of the Coalition.</p>	

The following table provides examples of these situations to be able to visualize their implementation and illustrates what measures can be expected to manage those situations.

<u>EXAMPLES OF CONCRETE SITUATIONS</u>	<u>ADDITIONAL MEASURES</u>
<p><u>Situation A:</u> Avoiding improper use of Coalition resources:</p> <p>A CCC member receives Coalition travel funds to attend an event representing the Coalition but then chooses not to attend the event.</p>	<p>Any funds already paid to the CCC member for travel that are not used for their designated purposes are to be reimbursed to the Coalition or are deducted from a next reimbursement payment by the Hub staff.</p> <p>All payments made by the Coalition and their purposes are to be adequately documented.</p>
<p><u>Situation B:</u> (Potential) CoI between UNCAC-C and a member organisation with a CCC seat:</p> <ul style="list-style-type: none"> ● A CCC member is involved with a Coalition fundraising effort, e.g the preparation/review of a proposal, to a donor that the CCC member organization (or an organization the CCC members is affiliated with) is also fundraising from or submitting a proposal to. ● The CCC takes a position on the situation in a given country that may interfere/conflict with an interest of one or some of the CCC members (e.g. the Coalition issues a statement critical of an authority that the member organization cooperates with or receives income from) 	<p>The (possible) CoI is declared in writing and/or in person (if the issue is discussed during a call/meeting).</p> <p>The CCC representative withdraws from the fundraising process.</p> <p>The (possible) CoI is declared in writing and/or in person (if the issue is discussed during a call/meeting).</p> <p>Appropriate steps are discussed by the CCC, which could include:</p> <ul style="list-style-type: none"> ● Documentation of the diverging opinion; ● Withdrawal from the decision-process.
<p><u>Situation C:</u> (Potential) CoI between UNCAC-C and partner / donor organisation, or any other institution (especially public ones, which are often subject to watchdog activities):</p> <ul style="list-style-type: none"> ● A donor to the Coalition is subject of a Coalition report or statement. ● A partner organization of the Coalition is seeking to exert undue influence on the Coalition and its activities. 	<p>Elaboration of principles regarding the acceptance and disclosure of funding, including measures to protect the independence of the Coalition from undue outside influence.</p> <p>Attempts of undue influence are documented, raised in fora deemed appropriate by the CCC (for example with the leadership of the other organization or its board) and/or made public.</p>
<p><u>Situation D:</u> Nepotism, favouritism, cronyism related to any UNCAC-C activities:</p> <ul style="list-style-type: none"> ● The Coalition is hiring staff/consultants or determining recipients of sub-grants, training attendance grants, etc. 	<p>Any personal relationship with an applicant needs to be disclosed by an involved decision-maker in writing to the CCC.</p> <p>Withdrawal from the decision-process, as deemed appropriate.</p>

	<p>A minimum of 2 CCC members (and/or Coalition staff/consultants) should be involved in and/or oversee decisions about the allocation of funding, positions and resources.</p>
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General Procedure

1) Each CCC member will complete a **Declaration of Interest** within one month of the CCC election and to be updated one year later. A standardized format for the declarations will be elaborated that will include all paid positions of the CCC member, as well as any other boards they sit on and companies/entities they own significant

shares of, or hold significant financial interests in. The declarations will be published on the UNCAC Coalition website (upon CCC approval).

2) Information on ethical and CoI management should be a part of CCC members' **annual statement**.

3) CCC members will report to the Coalition Chair or the Coalition Coordinator, and/or on the spot, when a declared or an unanticipated conflict of interest arises.

4) Any third party – including representatives of member organizations, affiliated organizations or non-members – are allowed to inform other CCC members confidentially about potential or actual CoI bearing on other members. For this purpose, a dedicated email address will be created. These reports will be received by Coalition Chair and one staff member at the Hub.

5) Procedures for responding to possible violations of the guidelines:

- a) Upon having indications or information about a possible violation of these guidelines the Coalition, through a Coalition staff member or Coalition member designated by the Chair, will seek clarification from the CCC member.
- b) The Coalition will, if needed, seek information from third parties or others to help clarify the situation.
- c) The designated staff or member for the Coalition will bring the issue to an Ethics Committee (previously designated among the CCC members). If the raised issue has been clarified to the satisfaction of the Ethics Committee, the matter will be closed and logged by the designated individual in the Ethics Log. If further clarification is needed, the Ethics Committee will decide in this respect. If it is the case that a suspension or a withdrawal from the Committee is necessary, the Committee will raise the issue to be decided by the CCC upon its recommendation.