WHISTLEBLOWING GUIDELINES

Introduction

In accordance with Sida’s instruction (2010:1080) and in order to achieve the development assistance objectives in its project management, the authority shall make special efforts to counteract corruption and irregularities and organize its operations so that corruption and irregularities are counteracted.

Sida defines corruption as the abuse of trust, power or position for improper gain. Corruption includes, among other things, the offering and receiving of bribes including the bribery of foreign officials, extortion, conflicts of interest and nepotism.

Sida’s attitude to corruption and irregularities is:

Always prevent
Never accept
Always inform
Always act

Whistleblowing

In accordance with Sida’s anti-corruption rule (see annex 1), employees must report any suspicion of corruption to their immediate manager, Sida’s investigative function or through the use of Sida’s whistleblowing system. Observe that the whistleblowing system is a complement to the regular reporting channels and procedures.

Employees reporting suspicion of corruption or other irregularities may not be subjected to reprisals or harassment.

After formal consultation with the Data Inspection Board, the people involved who may submit information relating to corruption and irregularities may be increased and this may also include people who do not work for the authority.
Postal address: 105 25 Stockholm
Visitor’s address: Valhallavägen 199, 105 25 Stockholm
+ 46 8-698 50 00.
Fax: +46 8-20 88 64.
Telegram: sida stockholm.
Plusgiro: 1 5634-9
Org no. 2021004789
Sida’s website: http://www.sida.se
Where to submit tips?

On Sida’s website [www.sida.se](http://www.sida.se) under Anti-corruption there is a page with a form where information relating to suspicion of corruption and irregularities can be submitted. The receiving of a tip is carried out in accordance with an agreement Sida has with PwC and is sent over by courier for registration, case handling and investigation to Sida.

Incoming tips and documents are dealt with on working days between 09:00 and 17:00. Sida and PwC reserve the right to *not* guarantee full access in the event of computer traffic problems or any other form of technical impact on the system.

How is the information dealt with?

The processing of personal data

The system handles the processing of personal data as follows.

1. **Responsible for personal records**

   Sida is responsible for the personal records contained within the whistleblowing system.
   
   Address: Valhallavägen 199, 105 25 Stockholm
   
   Telephone number: 08-698 50 00

2. **Personal data assistant**

   Öhrlings PricewaterhouseCoopers AB (PwC)
   
   Org. no: 556029-6740
   
   Address: Torsgatan 21, 113 97 Stockholm
   
   Tel: 08-555 330 00

3. **Purposes of the procedure**

   Personal records are used in the whistleblower system to deal with the notification that is submitted to the system and in order to investigate whether the people or organisations that have been singled out have taken part in criminal acts such as corruption or other serious financial irregularities.
4. The information that is processed

The personal records Sida processes include the information that is submitted with the notification and also any additional information that might be recovered in order to be able to carry out an appropriate investigation. The information may include names, positions and other details pertaining to an infringement of a law.

5. Recipients of the data

a. PwC receives incoming tips via a link from Sida’s website www.sida.se. PwC does not deal with the information itself but sends it in paper format to Sida via a classified courier service; this is carried out on a daily basis.

b. Sida receives the information from PwC by courier which is signed for. Sida has limited permission to access data in the whistleblowing system so that only Sida’s investigation team that handles notifications and leads investigations has access to the information contained within the system.

6. The right to information from the register etc.

According to section 26 of the Personal Data Act (PUL – Personuppgiftslagen 1998:204), the person supplying the information has the right, once per calendar year, to gain access to information at no cost regarding own personal records that are handled by Sida. If the person supplying the information requires such information he/she must send a written and signed request to Sida (see address above).

If the personal records of the person supplying the information are dealt with in violation of PUL, then he/she can request that personal records are corrected, blocked or erased in accordance with section 28 (PUL).

7. Right-of-Access principle

As Sida is a Swedish authority, all records that are registered with Sida are, as a rule, considered public documents. If a member of the general public requests access to a document it must therefore be disclosed insofar as it does not contain information that is covered by the obligation for confidentiality pursuant to the Public Access to Information and Secrecy
Consequently Sida cannot guarantee that the notification is kept confidential.

**Screening procedures**

Sida has submitted a request to the National Archives regarding a screening decision. The notifications received and registered by Sida must be removed after 2 years. Notifications that do not lead to any action will be removed when they are no longer of any interest. PwC will screen data relating to a notification in accordance with the agreed contract.

**Anonymity**

Anonymous notifications will be dealt with in the same manner as other notifications. The person presenting the information must however be aware, that the information from the investigation and the identity of the informant may be surrendered if required for judicial proceedings or in accordance with the principle of public access.

**False and misleading accusations**

Notifications must be made in good faith. Should it transpire that a notification is misleading or false, the investigation will not be initiated and all information will be removed immediately from the system. Please note that Sida may take legal or disciplinary action if this were proved to be the case.

**Routines for investigation**

The investigation team has routines to follow when conducting an investigation. When a notification of suspected irregularities or corruption is received by the whistleblowing system, it is registered, and the value of the information is subsequently analyzed. If there is any substance in the information, an investigation is commenced. If the notification relates to a Sida employee, the notification is referred to the Staff Disciplinary Board for which the personnel manager is responsible. If the notification involves a criminal act, Sida’s Chief Legal Advisor may be engaged to evaluate the case.

For more information contact Sida’s investigation team, write to: investigation@sida.se

**Revisions to Policy**

This policy will be reviewed each year and subsequently ratified by the Director-General.
ANTI-CORRUPTION RULE

1 § Objective

The objective of this rule is to counteract corruption and other irregularities and in so doing make a contribution so that the objectives of Sida’s operations are fulfilled and to support the cooperating countries’ efforts to combat corruption.

2 § Motive

According to Sida’s instruction (2010:1080), in order to achieve the development policy objectives when managing its projects, Sida shall pay particular attention to the combating of irregularities and corruption and organise its activities so that irregularities and corruption are counteracted.

All managers and other employees have a responsibility to ensure that they are skilled in identifying, recognising and managing corruption risks, the negative consequences of corruption as well as Sweden’s commitments to combat corruption in accordance with international conventions.

The purpose of this regulation is to define how Sida’s anti-corruption work should be carried out.

3 § Scope and application

The rule will be applied by all Sida’s employees at missions abroad that are financed by Sida’s allocated financial resources.

4 § Corruption

Sida defines corruption as the abuse of trust, power or position for improper gain. Corruption includes for instance the offering and receiving of bribes including the bribery of foreign officials, extortion, conflict of interest and nepotism.
An official is partial when there is evidence that is likely to discredit his or her impartiality in the handling of a case. If there is a conflict of interest, the member of staff may not deal with the case.

### 5 § Means

Managers have an overall responsibility to ensure that his/her employees have requisite knowledge of corruption.

Managers and other employees must work actively to prevent corruption by identifying, highlighting and considering the risks of corruption in all activities. Corruption risks should be taken into account in the strategy process as well as in the preparation, implementation and follow-up of projects.

Sida’s attitude to corruption and financial irregularities is:

- Always prevent
- Never accept
- Always inform
- Always act

An employee has an obligation to report suspicion of corruption to his/her immediate superior, Sida’s investigative function, or through the use of Sida’s "Whistleblower system".

A manager who receives information about a suspicion must contact Sida’s investigative function, and in consultation with this function, decide on the measures to be taken.

Employees that report suspicion of corruption or other irregularities may not be subjected to reprisals or harassment.

At its missions abroad, Sida shall strive to ensure that there is a coherent strategy for its anti-corruption work related to its development cooperation.

**Regulator: VU**

**Regulatory decision: 2008-006219**

**Revision of D-G decision XX/2011**