



*Latinamerika-
grupperna (SAL)
Compliance Audit*

PwC

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Executive summary

The compliance audit has resulted in the following recommendation, per section and in order of priority:

Recommendations: Agreements between the PCO and the LEO

The document “transferencias bancarias” is not an optimal document to verify signatories. Supporting documentation for signatories should preferably be the LEO's own list of signatories and board minutes stating the appointment of signatories. It is not possible for an external observer to verify that signatories of the agreements hold signing rights, using the “transferencias bancarias”. From our review we furthermore noted that in two cases, signatories of the agreement did not match signatories of the “transferencias bancarias”, indicating that the process of checking the signatories of agreements should be strengthened. SAL should ensure that signatories of the agreement always matches what is listed in the supporting documentation collected to verify the signatories of the LEO. **(H)**

SAL should ensure that their agreements with partners include all the mandatory requirements listed by Forum Syd. **(H)**

IDs should be collected as formal documentation for LEO signatories. **(L)**

Recommendations: Requisition and Disbursement of Funds

The process of checking that requisitions are signed by two authorized persons of LEOs should be strengthened. The process need to include a yearly check of who is allowed to sign requisitions for the LEO, as well as a formal sign-off from SAL for every requisition, indicating that this has been signed by the appropriate representatives of the LEO. **(H)**

Recommendations: Administration of Funds

SAL should keep primary documentation (directly from the bank or bank documents provided by the LEO) supporting that LEOs handling of bank accounts complies with Forum Syd's requirements. **(M)**

Recommendations: Procurement

SAL should ensure that Forum Syd's procurement policy is adhered to. Exceptions from the policy should only be made upon written confirmation from Forum Syd. **(M)**

Recommendations: Financial accounting and reporting of results:

The fact that only the accountant can access (and is familiar) with the accounting constitutes a risk. SAL should ensure that, at least, one more person within the organisation has access to the accounting and is familiar with the set-up of the accounting. **(M)**

We recommend that documentation of MANGO-checks are properly stored. We also recommend that the MANGO-check is carried out (updated) at least biannually. **(M)**

Latinamerikagrupperna (SAL)

The difference in replies between the PCO and the LEO's highlights the need for SAL to clarify with partners and Forum Syd what is to be considered as a currency gain or loss in the project. Currency gains must be reported to Forum Syd. **(M)**

We recommend SAL to consider implementing a written policy/guideline for handling of foreign exchange. **(L)**

Recommendations: Audit

The PCO should initiate a dialogue with partners' auditors in order to ensure that reporting according to the agreement is received. An option to accomplish this is to provide the auditor with examples of the requested reporting. Please note that it will, ultimately, be the local auditor who decides which formats for reporting that are applied, keeping local regulations in mind. **(M)**

SAL should ensure that documented assessments of LEO-auditors are kept at the head-office and that these assessments are renewed on a regular basis. **(M)**

SAL should clarify with Forum Syd whether a Management Letter is necessary even if all observations are covered by the report of factual findings. **(L)**

An option available to further ensure that audit reporting according to the agreement has been received, would be to specify what reporting should be received from LEOs' auditors (i.e. ISA 805, ISRS 4400 and Management Letter) in the checklist. **(Suggestion)**

Recommendations: Corruption and other mismanagement

SAL should ensure that a risk analysis, including the risk of corruption per LEO, is prepared/updated on a yearly basis. **(L)**

In case of corruption, there are many benefits with having a detailed procedure in place, describing how to handle the case, as a support for staff. Actions taken may affect the organization's opportunity of successfully taking legal action, this is one of many reasons for having a detailed procedure in place. Even though a procedure is in place, we recommend that SAL evaluates whether this procedure should be made more detailed. **(L)**

We recommend that SAL documents, and applies, a routine for follow-up measures to be conducted during partner visits. This should include (but not be limited to) following up on handling of corruption/mismanagement **(L)**

We recommend that SAL considers whether a whistleblowing function should be formalized. A formalized routine would increase SAL's chances of detecting fraud and mismanagement. **(Suggestion)**

Overview

The report is divided into seven sections, each representing one of the corresponding focus areas for the Compliance Audit:

1. Agreements between the PCO and the LEO
2. Requisition and Disbursement of Funds
3. Administration of Funds
4. Procurement
5. Financial Accounting and Reporting of Results
6. Audit
7. Corruption and other mismanagement

For every focus area, the PCO has been requested to answer questions and supply documentation. For some areas, the LEOs of the PCO have also been requested to provide answers and documentation, with the purpose of verifying the responses from the PCO.

In the report, questions and requests for documentation are represented by the “Criteria”-column. For each “Criteria”, one of the following designations have been chosen, based on our assessment:

- Y = Yes (True)
- N = No (False)
- P = Partly true

It should be noted “N” does not always translate into non-compliance or signalize a weakness, it depends on the specific criteria. “P” is chosen in cases when some responses/documentation confirms the criteria, whereas some does not, or in cases where criteria are only met partly (for instance if documentation verifies two out of three necessary conditions). It should also be noted that the designation is based on the answers/documentation provided to us during the compliance audit.

For each Criteria, we also provide comments supporting the designation. For each observation identified, a recommendation is provided. The designations H (High), M (Moderate) as well as L (Low) at the end of each recommendation, specify the grade priority. High priority implies that the necessary measures should be initiated immediately to address the findings which emerged during the review. Moderate priority implies that the findings that emerged during the review should be addressed within six months. Low priority implies that the findings that emerged during the review should be attended to within one year. In some cases, a designation has not been included, these are suggestions which we believe would increase organisational effectiveness or clarify conditions.

LEOs included as samples

In this Compliance Audit, three LEOs have been included as samples. These are:

- Convergencia Nacional Maya Waqib Kej (Waqib Kej)
- Coordinadora Latinoamericana de organizaciones del campo/La Vía Campesina – Centroamerica (Coord LATAM CA)
- Coordinadora Latinoamericana de organizaciones del campo/La vía Campesina - (Coord LATAM Continental)
- Coordinadora Latinoamericana de organizaciones del campo/La vía Campesina - Sudamérica Brazil (Coord LATAM Sud Brazil)

1 Agreements between the PCO and the LEO

Criteria	Y/N/P ¹	Comment	Recommendations
Does the PCO have documented agreements with LEO's?	Y	One agreement per LEO was provided	
Does the documentation provided regarding signatories of the agreements ("LEO signatories") support that these hold signing rights?	P	<p>SAL has, for each LEO, provided the document "transferencias bancarias" to support that the signatories of the agreements are authorized. From our correspondence with SAL we have understood that this is a form from SAL that SAL asks every LEO to fill out in order to verify the signatories of the LEOs' bank accounts. From our review, we have also noted that these documents are not dated.</p> <p>For each LEO, at least one of the signatories of the agreement is included on the "transferencias bancarias". For two LEOs, only one of the signatories matches.</p>	<p>The document "transferencias bancarias" is not an optimal document to verify signatories. Supporting documentation for signatories should preferably be the LEO's own list of signatories and board minutes stating the appointment of signatories. It is not possible for an external observer to verify that signatories of the agreements hold signing rights, using the "transferencias bancarias". From our review we furthermore noted that in two cases, signatories of the agreement did not match signatories of the "transferencias bancarias", indicating that the process of checking the signatories of agreements should be strengthened. SAL should ensure that signatories of the agreement always matches what is listed in the supporting documentation collected to verify the signatories of the LEO. (H)</p>

¹ Partly true

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Do the PCO collect identification documents (ID's) for LEO-signatories	N	ID's are not collected, this being said, SAL highlights that the LEOs, as well as signatories of the LEOs, are well-known to SAL.	IDs should be collected as formal documentation for LEO signatories. (L)
Does the PCO use Forum Syd's standard template agreement?	N	<p>SAL uses their own format which, however, according to the organization is adapted to include relevant requirements listed in Forum Syd's standard template agreement. The organisation has provided a checklist (appendix 1) listing the Forum Syd requirements and confirmed which requirements that are currently included in SAL's template. From this checklist, we have noted a few requirements that are currently not being met, these are listed above (our comments, if applicable, in parenthesis and italics):</p> <ul style="list-style-type: none"> • The Grantee is obliged to provide the following documents to the PCO as soon as they are prepared: The Organization's Annual report, Annual reports, Audits, Annual Meeting Minutes, All the minutes showing the election of an authorized signatory (<i>according to SAL, partners are not obliged to provide the documents, SAL however has the right to get the documents, if requested</i>). • The Grantee shall immediately inform the PCO of suspicion of corruption or irregularities • In the event a refund is not made, late payment interests will apply according to the Swedish Interest Act from the day on which the refund should have been made and until payment has reached the Grant Provider. • For claims under the <i>Agreement</i>, such as claims for reimbursement of funds, the provisions of the Swedish Limitations Act (Sw: "Preskriptionslagen") will apply. <p>Apart from this, a few requirements are listed as "partly" met (as specified in appendix 1).</p>	SAL should ensure that their agreements with partners include all the mandatory requirements listed by Forum Syd. (H)

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Does the PCO intend for the LEOs to sub-grant funds to partners?	N		
If further transfers are intended: What subsequent partners are to receive funding according to the agreements?	N/A	According to the PCO, as well as LEOs of the PCO, LEOs do not sub-grant funds to partners.	
Do LEOs claim to forward funds?	N		

Recommendations: Agreements between the PCO and the LEO

The document “transferencias bancarias” is not an optimal document to verify signatories. Supporting documentation for signatories should preferably be the LEO's own list of signatories and board minutes stating the appointment of signatories. It is not possible for an external observer to verify that signatories of the agreements hold signing rights, using the “transferencias bancarias”. From our review we furthermore noted that in two cases, signatories of the agreement did not match signatories of the “transferencias bancarias”, indicating that the process of checking the signatories of agreements should be strengthened. SAL should ensure that signatories of the agreement always matches what is listed in the supporting documentation collected to verify the signatories of the LEO. **(H)**

SAL should ensure that their agreements with partners include all the mandatory requirements listed by Forum Syd. **(H)**

IDs should be collected as formal documentation for LEO signatories. **(L)**

2 Requisition and Disbursement of Funds

Criteria	Y/N/P	Comment	Recommendations
Are the signatories of the requisitions included on the LEO list of signatories?	P	<p>For two of the LEO's (Coord LATAM CA and Coord LATAM Sud Brazil), one out of the two signatories of the requisition was included in the document (transferencias bancarias) that SAL uses to check authorized signatories of the LEO.</p> <p>For the LEO Coord LATAM Continental, none of the names match and for Waqib Kej, the requisitions have only one signatory (however, this signatory is authorized according to the documentation provided by SAL).</p>	The process of checking that requisitions are signed by two authorized persons of LEOs should be strengthened. The process need to include a yearly check of who is allowed to sign requisitions for the LEO, as well as a formal sign-off from SAL for every requisition, indicating that this has been signed by the appropriate representatives of the LEO. (H)
Are contracts with LEOs dated prior to the first 2017-disbursements from the PCO?	Y	Contracts are dated prior to the first 2017 disbursements.	
Have supporting documentation been collected in order to ensure that LEO's have received the funds disbursed?	Y	SAL collects supporting documentation from partners. According to our interview, SAL also communicates with partners, in order to ensure that funds paid out has reached the partner.	
Are the transfers of funds made via the international banking system? Is the sum of payments made via the international banking system equal to the amount per LEO in question 2.3?	Y	According to SAL, LEOs and as supported by documentation provided, transfers are made though the international banking system.	

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If transfers of funds are not made via the international banking system' have Forum Syd given a written approval for this?	N/A		
Are the LEOs' replies consistent with information provided by PCO, regarding whether funds have been received via the international banking system?	Y	LEOs state that funds have been received via the international banking system.	

Recommendations: Requisition and Disbursement of Funds

The process of checking that requisitions are signed by two authorized persons of LEOs should be strengthened. The process need to include a yearly check of who is allowed to sign requisitions for the LEO, as well as a formal sign-off from SAL for every requisition, indicating that this has been signed by the appropriate representatives of the LEO. **(H)**

3 Administration of Funds

Criteria	Y/N/P	Comment	Recommendations
Does the PCO collect supporting documentation, indicating that the PCO has followed up that LEO's deposit the grant in a bank account which can only be accessed by authorised signatories of the LEO, and that payments from the account must be signed jointly by at least two persons?	Y	<p>According to SAL, this is checked by the project auditor; our samples for 2016 supports this.</p> <p>SAL does not keep primary documentation (directly from the bank or bank documents provided by the LEO) supporting that LEOs handling of bank accounts complies with Forum Syd's requirements.</p>	SAL should keep primary documentation (directly from the bank or bank documents provided by the LEO) supporting that LEOs handling of bank accounts complies with Forum Syd's requirements. (M)
Does LEOs confirm that funds are kept in a bank account in compliance with Forum Syd's requirements?	Y	This is confirmed by all LEOs included in the sample.	

Recommendations: Administration of Funds

SAL should keep primary documentation (directly from the bank or bank documents provided by the LEO) supporting that LEOs handling of bank accounts complies with Forum Syd's requirements. **(M)**

4 Procurement

Criteria	Y/N/P	Comment	Recommendations
Does the PCO have a documented procurement policy that is applied for funds from Forum Syd?	Y	The PCO does not have a policy of their own but states that Forum Syd's procurement policy should be used for funds from Forum Syd.	
Are Forum Syd's procurement policy, or comparable/stricter requirements observed for procurement financed with funds from Forum Syd?	P	<p>From our samples, we did not identify any instance where SAL had bought services/goods for a cost above 300 000 SEK, using funds from Forum Syd, from a single supplier during 2017. This being said, there are examples of suppliers where this sum would be higher if two or more years were summarized.</p> <p>We identified cases, during 2017, when SAL have been using Forum Syd funds to procure services above the value of 50 000 SEK, below 300 000 SEK, from a single supplier.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Services from Globalpsykologerna • Insurance from ERV • Rent payments for the office of SAL (Solidaritetshuset) <p>According to SAL, written price comparisons does not exist in these cases. It should be noted that in none of the instances mentioned above, the value of 50 000 SEK was reached for a single purchase.</p>	SVLA should ensure that Forum Syd's procurement policy is adhered to. Exceptions from the policy should only be made upon written confirmation from Forum Syd. (M)

Recommendations: Procurement

SAL should ensure that Forum Syd's procurement policy is adhered to. Exceptions from the policy should only be made upon written confirmation from Forum Syd. **(M)**

5 Financial Accounting and reporting of results

Criteria	Y/N/P	Comment	Recommendations
Does the PCO have an accounting system?	Y	Hogia Ekonomi accounting system	
Does the PCO have a defined group of staff with access to the accounting system?	Y	Within SAL, only the accountant of SAL has access to the accounting system. In theory, also the accountant of the Svalorna Latinamerika (that shares the office with SAL) may access the accounting, this is however generally not done, meaning that only the accountant of SAL is familiar with the accounting.	The fact that only the accountant can access (and is familiar) with the accounting constitutes a risk. SAL should ensure that, at least, one more person within the organisation has access to the accounting and is familiar with the set-up of the accounting. (M)
Does the PCO apply project accounting?	Y		
Does the PCO store accounting documentation in accordance with Swedish Law?	Y		
Has the PCO assessed the financial management capacity of the LEOs using MANGO-health checks?	P	An adapted version of a MANGO health check has been carried out for three out of the four LEOs 2016-2017. A MANGO has not been provided for Coord LATAM Continental, but according to SAL a MANGO was prepared in 2014.	We recommend that documentation of MANGO-checks are properly stored. We also recommend that the MANGO-check is carried out (updated) at least biannually. (M)
Does the PCO use the Forum Syd FACT (Financial and Administrative Capacity Tool) for LEO's? *	N		

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Does the PCO assess the financial management capacity of LEOs using another tool than Mango health check or FACT?	Y	According to the PCO, it provides education on financial management to its partners, as well as carries out samples checks during partner visits, in order to ensure sound financial management. According to SAL, sample checks may be carried out using different “tools”. SAL has shared an example of such a tool, which details tests to be carried out during project visits.	
Do the LEO’s have an accounting software?	P	Three out of for selected LEOs state that an accounting software is used by the organization. One LEO, Coord LATAM Continental, states that an accounting system is not in use, however, the organization states that an accountant has been hired for the specific purpose of prepare reports in accordance with the requirements of SAL.	
Do the LEO’s apply project accounting for funds from the PCO?	P	Three out of for selected LEOs state that this is the case. Coord LATAM Continental has not been given the opportunity to answer the question, since this question is contingent on the organization having an accounting system. This being said, the solution applied by this organization (the hiring of an accountant specifically for the project) might be interpreted as a kind of “project accounting”, even if it is handled outside a proper accounting software.	
Does the LEO have other computerized systems (apart from the accounting system) that are used for Financial Management purposes?	N	One LEO states that back-up accounting is kept in excel, all other LEOs have responded “no”.	
Does the LEO have a computerized project management system?	N		

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Does the PCO have documented procedures for planning, monitoring, evaluating and reporting of the use of grants and operational results?	Y	Procedures are included in the manual of the organization, "Reglamento SAL 2017-2021".	
Have the selected LEOs submitted reporting according to the agreement valid for 2016?	Y	Financial, narrative and audit reporting has been supplied from SAL for the selected LEOs.	
Does a written policy or other documentation exist with regard to the PCO's handling of Foreign Exchange?	N	From our interviews, we have understood that a practice regarding the handling of exchange-rates exists, this is however not documented in writing.	We recommend SAL to consider implementing a written policy/guideline for handling of foreign exchange. (L)
Do LEOs receive guidelines regarding Foreign exchange?	Y	Guidelines are included in the agreement, stating that currency gains should be re-paid to SAL, unless an agreement is reached with SAL.	
Does the PCO state that it is monitoring handling of Foreign Exchange at the level of the LEO?	Y	Budgets with partners are made in USD, but agreements are in SEK. It is the responsibility of the country-offices to monitor local exchange-rates and the implications these may have on the budgets. These gains/losses does, however, not have any implications from the perspective of the agreement (since the agreement is in SEK).	
Did any LEO's, according to the PCO, report gains or losses for 2016?	N		

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Does the reply from the PCO regarding exchange gains/losses at the level of the LEO match replies/documentation from the LEOs?	N	Three LEOs (Waqib Kej, Coord LATAM Centro, Coord LATAM Centro and Coord LATAM Sud Brazil) state that exchange gains or losses have been incurred. Supporting documents from the LEO-level show that currency gains have been incurred. According to the agreement between Forum Syd and SAL, currency gains should be reported and repaid to Forum Syd. Currency gains may be used within the project, if this is allowed by Forum Syd.	The difference in replies between the PCO and the LEO's highlights the need for SAL to clarify with partners and Forum Syd what is to be considered as a currency gain or loss in the project. Currency gains must be reported to Forum Syd. (M)
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Recommendations: Financial accounting and reporting of results:

The fact that only the accountant can access (and is familiar) with the accounting constitutes a risk. SAL should ensure that, at least, one more person within the organisation has access to the accounting and is familiar with the set-up of the accounting. **(M)**

We recommend that documentation of MANGO-checks are properly stored. We also recommend that the MANGO-check is carried out (updated) at least biannually. **(M)**

The difference in replies between the PCO and the LEO's highlights the need for SAL to clarify with partners and Forum Syd what is to be considered as a currency gain or loss in the project. Currency gains must be reported to Forum Syd. **(M)**

We recommend SAL to consider implementing a written policy/guideline for handling of foreign exchange. **(L)**

6 Audit

Criteria	Y/N/P	Comment	Recommendations
Is audit reporting for the PCO's Forum Syd-funding prepared according to the PCO-agreement with Forum Syd covering 2016?	P	The audit includes an auditor's report according to ISA 805 and a report of factual findings according to ISRS 4400. No Management Letter has been prepared, however, in the report of factual findings the auditor highlights that "there are no further observations from the performed audit procedures to report".	SAL should clarify with Forum Syd whether a Management Letter is necessary even if all observations are covered by the report of factual findings. (L)
Is audit reporting for the LEO's Forum Syd-funding prepared according to the PCO-agreement with Forum Syd covering 2016?	P	<p>Audit reporting for three out of four LEOs includes an audit report with reference to ISA, as well as a management letter. In one case, Waqib Kej, the Management letter has not been attached to the report and we have therefore not been able to verify this. A separate report according to ISRS 4400 has not been received, this being said, some of the requested information (for instance, regarding bank accounts) is included in the management letters.</p> <p>In the fourth case, Coord LATAM Continental, the auditor makes reference to national standards in the audit report. The audit opinion is qualified, since an amount of 7000 USD have been forwarded to another organization in Colombia. According to SAL, this has since been followed up and it was confirmed that the transfer had been approved by SAL. A management letter is included, but a separate report according to ISRS 4400 has not been received.</p>	The PCO should initiate a dialogue with partners' auditors in order to ensure that reporting according to the agreement is received. An option to accomplish this is to provide the auditor with examples of the requested reporting. Please note that it will, ultimately, be the local auditor who decides which formats for reporting that are applied, keeping local regulations in mind. (M)

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Does the PCO have a defined routine for following up on audit reports and financial reporting received from LEO's?	Y	SAL has a standard template/checklist to be applied for audit reports and financial reports received from LEOs. The checklist does not provide detailed information on what kind of audit reporting that can be expected from the LEOs.	An option available to further ensure that audit reporting according to the agreement has been received, would be to specify what reporting should be received from LEOs' auditors (i.e. ISA 805, ISRS 4400 and Management Letter) in the checklist. (Suggestion)
Does the PCO collect management responses regarding the audits?	Y	Management responses are included in the audit reporting from the LEOs as well as collected in SAL's standard template/checklists.	
Does the PCO follow up on management responses?	Y	According to SAL, management responses should include the LEOs opinion regarding the audit reporting, as well as a list of tasks in order to handle weaknesses identified in the audit.	
Does the PCO provide documented assessments of LEO-auditors?	N	SAL has provided a checklist that according to SAL is used to assess LEOs' auditors. No documented assessments were provided to us for this compliance audit. According to the PCO, all LEO-auditors are eligible to work according to standards published by IFAC.	SAL should ensure that documented assessments of LEO-auditors are kept at the head-office and that these assessments are renewed on a regular basis. (M)

Recommendations: Audit

The PCO should initiate a dialogue with partners' auditors in order to ensure that reporting according to the agreement is received. An option to accomplish this is to provide the auditor with examples of the requested reporting. Please note that it will, ultimately, be the local auditor who decides which formats for reporting that are applied, keeping local regulations in mind. **(M)**

SAL should ensure that documented assessments of LEO-auditors are kept at the head-office and that these assessments are renewed on a regular basis. **(M)**

SAL should clarify with Forum Syd whether a Management Letter is necessary even if all observations are covered by the report of factual findings. **(L)**

An option available to further ensure that audit reporting according to the agreement has been received, would be to specify what reporting should be received from LEOs' auditors (i.e. ISA 805, ISRS 4400 and Management Letter) in the checklist. **(Suggestion)**

7 Corruption and other mismanagement

Criteria	Y/N/P	Comment	Recommendations
Does the PCO have an anti-corruption policy and/or other documented procedures to analyse and mitigate risk of corruption?	Y	SAL has an anticorruption policy. The policy is based on Forum Syd's anti-corruption policy.	
Does the anti-corruption policy of the PCO cover what is included in Forum Syd's Anti-Corruption Policy?	Y	According to SAL, and as verified in the compliance audit, the policy covers what is included in that of Forum Syd.	
Do the LEOs have an anti-corruption policy and/or other documented procedures to analyse and mitigate risk of corruption?	Y	Forum Syd's anti-corruption policy has been annexed to the agreement with LEOs, in addition to this two out of four LEOs also makes references to other documents such as their statutes.	
Do the anti-corruption policies of the LEOs cover what is included in Forum Syd's Anti-Corruption Policy?	Y	All LEOs included in the sample confirms that this is the case, as supported by the fact that the Forum Syd policy is also annexed to the main agreement.	
Does PCO have a documented analysis of risk of corruption per LEO?	N	A high-level risk analysis is annexed to the agreement with Forum Syd. From our interview, we understand that risks, including risk of corruption, are being discussed with LEOs during site-visits. The PCO has not the routine of preparing/updating written risk assessments on a yearly basis.	SAL should ensure that a risk analysis, including the risk of corruption per LEO, is prepared/updated on a yearly basis. (L)

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Does PCO have documented procedures to handle suspected or identified cases of corruption?	Y	The anti-corruption policy of SAL states that any suspicions should be flagged to an E-mail address in control by the head of operations, and also provide an alternative E-mail (to the board of SAL) in the event the suspicion involves the head of operation	In case of corruption, there are many benefits with having a detailed procedure in place, describing how to handle the case, as a support for staff. Actions taken may affect the organization's opportunity of successfully taking legal action, this is one of many reasons for having a detailed procedure in place. Even though a procedure is in place, we recommend that SAL evaluates whether this procedure should be made more detailed. (L)
Does the PCO have a whistle-blowing function available to LEOs?	P	According to the PCO, a formal function is not in place/communicated. Three out of four LEOs states that a whistle-blowing function is not in place. In one case, the bi-annual follow-up meetings with the PCO is highlighted as an opportunity to flag any irregularities.	We recommend that SAL considers whether a whistleblowing function should be formalized. A formalized routine would increase SAL's chances of detecting fraud and mismanagement. (suggestion)
Are the LEOs aware of any whistle-blowing function supplied by the PCO?	N/A		
Does the PCO systematically check that LEOs have implemented their policy/plan to act upon suspected corruption or other mismanagement	P	According to SAL, sample testing is done during partner visits. This being said, a documented routine applied by all offices are not in place.	We recommend that SAL documents, and applies, a routine for follow-up measures to be conducted during partner visits. This should include (but not be limited to) following up on handling of corruption/mismanagement (L)

Latinamerikagrupperna (SAL)

Does PCO have staff dedicated to control and follow up on suspected corruption or other forms of mismanagement?	Y	According to the PCO, this responsibility is shared within a group of four staff including the head of operations and the economist,	
Does PCO collect documentation regarding staff dedicated to control and follow up on suspected corruption or other forms of mismanagement at the level of the LEO?	N	No documentation is collected.	

Recommendations: Corruption and other mismanagement

SAL should ensure that a risk analysis, including the risk of corruption per LEO, is prepared/updated on a yearly basis. **(L)**

In case of corruption, there are many benefits with having a detailed procedure in place, describing how to handle the case, as a support for staff. Actions taken may affect the organization's opportunity of successfully taking legal action, this is one of many reasons for having a detailed procedure in place. Even though a procedure is in place, we recommend that SAL evaluates whether this procedure should be made more detailed. **(L)**

We recommend that SAL documents, and applies, a routine for follow-up measures to be conducted during partner visits. This should include (but not be limited to) following up on handling of corruption/mismanagement **(L)**

We recommend that SAL considers whether a whistleblowing function should be formalized. A formalized routine would increase SAL's chances of detecting fraud and mismanagement. **(suggestion)**