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Anti-bribery, Fraud & Corruption Policy

Introduction

The purpose of this statement is to give Network for Africa's policy on anti-bribery, fraud and corruption and sets out our responsibilities for their prevention. It also outlines the action to be taken if you discover or suspect activities involving bribery, fraud and/or corruption.

Bribery, fraud and corruption are found in all countries. They hurt the poor disproportionately, diverting resources intended for development and humanitarian assistance and increasing the costs of basic public services. They undermine economic growth and are a barrier to poverty alleviation and good governance. Often, bribery, fraud and corruption can aggravate conflict and insecurity.

There is a risk that corruption will prevent NGOs achieving their objectives, especially when they are working in countries where there are high levels of corruption. Suggestions that an NGO is linked to bribery in any way can be damaging to its reputation and undermine the trust and support of its beneficiaries, partners, the wider public and donors. Public concern about the impact of bribery and corruption is a critical issue in building broad public support for aid and development.

Policy statement

Network for Africa is committed to a policy of zero-tolerance of fraud in any form.

The term fraud is used to describe a whole range of activities such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Generally, however, fraud involves the intention to deceive a person or organisation in order to obtain an advantage, avoid an obligation or cause loss.

The term also includes the use of information technology equipment to manipulate programmes or data dishonestly, the theft of IT equipment and software, and the intentional misuse of computer time and resources.

Bribery is the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities. If you are offered a bribe, you must report it to your manager immediately. Bribery is a criminal offence. Network for Africa does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor will it accept bribes or improper inducements. To use a third party as a conduit to channel bribes to others is a criminal offence. Network for Africa does not, and will not, engage indirectly in or otherwise encourage bribery.

Objective of this policy

This policy provides a coherent and consistent framework to enable Network for Africa's employees and partner organisations to understand and implement arrangements to ensure compliance. All personnel, including those on temporary contracts and partner organisations are required to:

- Act honestly and with integrity at all times and safeguard Network for Africa's resources for which they are responsible.
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which Network for Africa and its partner organisations operate, in respect of the lawful and responsible conduct of activities.

Scope of this policy

This policy applies to all of Network for Africa's activities. All personnel – board of trustees; all staff, including those on permanent or temporary contracts; contractors; those in partner organisations; volunteers; freelance consultants – have a duty to abide by it and enforce it. They are also required to read, understand and comply with the policy, and raise concerns as soon as possible if a conflict with the policy has occurred, or may occur in the future. Personnel that breach this policy will face automatic disciplinary action, which could result in **dismissal for gross misconduct**, in addition to the possibility of civil and criminal prosecution in the UK. Network for Africa treats attempted fraud as seriously as accomplished fraud.

Network for Africa's policy prohibits the following:

1. Giving, promising to give, or offering a payment, gift or hospitality with the expectation or hope that an advantage will be received, or to reward an advantage already given;
2. Giving, promising to give, or offering a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
3. Accepting payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
4. Retaliating against or threatening a person who has refused to commit a bribery offence or who has raised concerns under this policy;
5. Any dishonest or fraudulent act;
6. Forgery or alteration of documents or accounts;
7. Misappropriation of funds, supplies or other assets;
8. Impropriety in the handling or reporting of money or financial transactions;
9. Theft or misuse of property, facilities or services; and
10. Engaging in any activities that breach this policy.

Implementation of policy

Network for Africa will implement policies to counter fraud including:

1. **High-level commitment** - The Board of Trustees and senior management will commit to and oversee the implementation of a policy of zero-tolerance, recognising that fraud is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.
2. **Risk assessment** – Fraud risk assessment will form a part of Network for Africa's overall and ongoing risk management process.
3. **Devise and implement robust fraud procedures** - Network for Africa will devise, implement and maintain robust procedures, which are proportionate to the risks and to the size, resources and complexity of the organisation.

4. **Due diligence assessment of partners, agents and contractors** - Network for Africa will assess the fraud risk associated with entering into partnership or contracting arrangements with other entities and carry out periodic due diligence based on that risk assessment. Partnership or contractual arrangements should check that these organisations have policies and procedures, which are consistent with Network for Africa's policies.
5. **Dissemination and communication** - Network for Africa will ensure effective internal and external communication of its policy and procedures. It will undertake training and awareness programmes to ensure staff and partner organisations are aware of the potential risks, how bribery, fraud and corruption might affect them, what they should do if they are offered a bribe or are asked to take part in any fraudulent and corrupt activities, and the consequences should they be found to have made or received a bribe and/or been involved in fraudulent and corrupt activities.
6. **Monitoring and evaluation** - Implementation of fraud procedures will be monitored as part of Network for Africa's overall risk management and internal control processes. Periodic reviews of fraud procedures will be made and reported as part of governance and accountability processes.
7. **Collective action** - Network for Africa is committed to sharing information and strengthening collective action to prevent fraud.
8. **Maintaining a fraud log** – Network for Africa will maintain a log of attempted bribes, actual bribes, frauds and similar losses and financial irregularities. This can be used to inform the risk management process and help to ensure that any control measures put in place are proportionate to the risk. It will also help to ensure that any regulatory reporting requirements are met (e.g. Charity Commission).

Raising a concern

Network for Africa is committed to ensuring that every staff member knows how they can raise a concern about fraud. We all have a responsibility to help detect, prevent and report instances of fraud. If you have a concern regarding a suspected instance of fraud, please speak up. The sooner you act, the sooner it can be resolved.

There are many ways in which you can raise your concerns. Please refer to the Disclosure of Malpractice in the Workplace Policy to find your preferred course of action. Concerns can be anonymous. In the event that an incident of fraud or wrongdoing is reported, Network for Africa will act as soon as possible to evaluate the situation and take appropriate action.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. Network for Africa aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

Network for Africa is committed to ensuring that nobody suffers detrimental treatment through refusing to take part in fraudulent activity, or because of reporting a concern in good faith.