

# ADVANTAGE AFRICA AND PARTNERS

## CORRUPTION POLICY

Lead Trustee – George Mwaura

*Reviewed every three years – Last reviewed Feb21 – next review due Feb24*

### 1. Scope

This policy applies to all the work of Advantage Africa and its partner organisations in East Africa and was developed collaboratively with their input. Partners contribute to the ongoing development of the policy and commit to implementing its principles and procedures.

### 2. Responsibilities

Advantage Africa trustees, staff and partners are responsible for:

- Taking and communicating a zero tolerance approach to the payment or receiving of bribes directly or indirectly.
- Acting in line with our organisational values of honesty, integrity and open partnership.
- Promoting a greater understanding of corruption and how to fight it.
- Reporting all cases of corruption.
- Putting in place systems that will reduce the opportunity for corruption.
- Subscribing to this policy.

### 3. Definitions, Examples and Signs

**Corruption** is '*dishonest or fraudulent conduct by those in power, typically involving bribery*'. This includes the misuse of resources intended for public benefit.

Resources, including funds, materials and time are bought and provided by Advantage Africa to benefit disadvantaged people. They have specific conditions attached to their use which must be adhered to at all times unless permission is given, because of specific circumstances, for a change in that use. Any breach of this principle is therefore a potential case of corruption.

**Bribery** is defined as "*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*"

Examples of corruption include:

- Receiving or paying funds or materials meant for a project, for personal gain, even on a temporary basis.
- Receiving an allowance from Advantage Africa to release you to do project work, and then doing insufficient project work to justify the allowance.
- Using a position of trust for dishonest gain or to undermine others.
- Receiving funding or claiming expenses for the same thing twice.
- Falsifying receipts or inflating costs.
- Not returning balances payable on advances made for project expenditure.
- Concealing things in order to deceive others (fraud).
- Making personal phone calls when Advantage Africa supports the costs of mobile phone airtime for project use only.
- Paying a local official to speak on behalf of a project when he/she already receives a salary from the government (bribery).

Furthermore, bad practices that can cause or indicate corruption include:

- Signing a blank cheque.
- Not getting and filing receipts.

Signs of corruption could include:

- Accounts contain many items with 0s on them.
- If the accounts reconcile and then it becomes clear there is an item that was not included.
- Changes in behaviour such as increased generosity or less social interaction.
- Things going too well and there are never any issues that require support or looking into.
- Lack of project progress.
- Lack of receipts and other supporting documents.
- Unexpected personal wealth.

#### **4. Reporting: What to do if you suspect corruption**

- Any case of corruption or bribery as defined, suspected (given the examples and signs above) should be reported confidentially and immediately, without exception.
- If the case occurs within one of Advantage Africa's partner organisations the report should be made to the manager of that organisation and the country Programme Manager. If the case concerns the organisation's manager, it should be reported to the Advantage Africa's relevant country Programme Manager. If the case occurs within Advantage Africa it should be reported to Advantage Africa's Director and if it concerns the Director to the Treasurer and Chair.
- Details recorded will include names and dates and initial evidence gathered for the suspected corruption.

#### **5. Investigation: How the facts will be established**

- All incidence of corruption will be assessed by the relevant Programme Manager, Director and Finance Manager based on the level of risk, in order to establish the level of escalation, investigation and subsequent action required.
- The method of investigation will vary from case to case. For example it may not be necessary to bring in the police if the offence is minor and easily exposed and the loss recoverable.
- In all cases, the items/records that need to be looked at such as cashbox, cashbook and filing trays should be isolated from all potential parties at the start of the process. To establish the facts, all relevant staff or volunteers should be interviewed immediately and discouraged from talking to each other.

Once an overall picture has been established, and should further clarity be needed, an independent person may be sought to give a less personal perspective on the findings from the initial investigation. This might include a phone call to a Trustee or discussion with an appropriate local mentor.

#### **6. Response: Action to be taken**

- Corruption is a serious matter and cannot be tolerated under any circumstances.
- Corruption is dealt with using Advantage Africa's disciplinary procedure or similar partner procedure
- Openness will be encouraged to prevent further concealment and an accelerated case.
- Advantage Africa can provide support to partners in dealing with corruption and future monitoring to ensure it doesn't happen again.
- Responses will depend on severity. They will vary from the suspension of project activities and withdrawal of funding, a written warning, dismissal for gross misconduct, through to criminal action and involvement of the police and courts.
- A brief report will be written and put on file.
- The lead Trustee on corruption and Treasurer will be informed and all 'serious incidents' will be reported to the Charity Commission, and any relevant donor if deemed necessary.

#### **7. Recovery of loss**

- If there is any loss to Advantage Africa or one of its partner organisations, steps will be taken to recover it as soon as possible, and a repayment schedule put in place promptly.
- Failure to keep to the repayment schedule is a serious disciplinary offence and could result in dismissal.

## **8. Ongoing implementation and improving controls for the future**

- Anti-corruption will be mainstreamed into Advantage Africa's financial policies and procedures. E.g. every transfer of funds to partner organisations includes a reminder of this policy and our mutual commitment to its implementation.
- New controls will be introduced carefully to ensure a similar case of corruption could not occur again. These should not be too bureaucratic or inhibit the positive work going on.
- It is important to ensure a culture of openness and that all managers review and authorise expenditure and activities rather than 'rubber stamp' what is put to them.
- Financial controls should be introduced in an empowering way. Financial controls and open accounting not only prevent corruption but provide accountability to beneficiaries and donors that enhances the reputation of Advantage Africa and its partners. This in turn reduces instances of jealousy and accusations of corruption from those around us.
- Advantage Africa will provide training to partners and staff which covers guidance on:
  - Possible signs of corruption.
  - What to do if offered or asked for a bribe.
  - Exceptional circumstances when individuals have no option but to make payments in order to protect against loss of life, limb or liberty and in humanitarian emergencies.
  - Receiving and recording of gifts or hospitality.
  - The definition and handling of conflicts of interest.
  - Procedures and protections for whistleblowing.
  - What to do if offered or asked for a bribe.
- Partners will be invited to contribute towards revisions of the policy and to sign updated versions as they are developed.

## **9. Organisational Declaration**

Our organisation agrees to follow this policy.

Signed:

Name:

Position:

Date:

On behalf of (organisation):