

Anti- Corruption and Fraud Policy Women for Water Partnership (WfWP)

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1. Introduction

WfWP does not tolerate corruption or fraud in any shape and decreases the risk through her policies and working arrangements. WfWP maintains a strict policy of zero tolerance to theft, fraud and misuse of resources.

Preventing corruption and fraud are at the heart of good governance and striving for integrity is an implicit part of the mission of WfWP. Combating corruption will be done through clear procedures, discouragement, transparency, risk management, monitoring and in case of suspicion of fraud investigating.

The Code of Conduct of WfWP is part of this policy.

The policy's goal is to prevent fraud and corruption in supported programmes and projects, and in contracts at the local, national, regional and international levels.

2. Definitions

According to Transparency International (TI) **corruption** is the abuse of entrusted power for private gain, whereas **integrity** means behaviours and actions consistent with a set of moral principles and standards, embraced by individuals as well as institutions that create a barrier to corruption (TI 2009)

Multiple methods of corruption are used concurrently with similar aims.

- **Bribery** meaning the improper use of gifts and favours in exchange for personal gain. It is the most common form of corruption. The types of favours given are diverse and may include money, gifts, sexual favours, company shares, entertainment, employment and political benefits. The personal gain that is given can be anything from actively giving preferential treatment to having an indiscretion or crime overlooked.
- **Embezzlement, theft** involves someone with access to funds or assets illegally taking control of them. **Fraud** involves using deception to convince the owner of funds or assets to give them up to an unauthorized party. Examples include the misdirection of company funds into "shadow companies", scams and other corrupt activity.
- **Extortion and blackmail** centre on the use of threats. This can be the threat of violence or false imprisonment as well as exposure of an individual's secrets or prior crimes. This includes such behaviour as threatening a public official with exposure of their secrets if they do not vote in a particular manner, or demanding money in exchange for continued secrecy.

Types of corrupt gains are:

- **Abuse of discretion** refers to the misuse of one's powers and decision-making facilities. Examples include a judge improperly dismissing a criminal case or a customs official using their discretion to allow a banned substance through a port.
- **Favouritism, nepotism and clientelism** involve the favouring of not only the perpetrator of corruption but someone related to them, such as a friend, family

member or member of an association. Examples would include hiring or promoting a family member or staff member to a role they are not qualified for, who belongs to the same political party as you, regardless of merit. Some states do not forbid these forms of corruption.

3. Process and Sanctions

In case of suspicion of fraud and corruption the following measures will be taken.

- Any suspicion or indication of fraud and corruption will be investigated immediately. Depending on the case the Steering Committee (SC) will nominate an independent person or auditor to carry out the investigation. The results of the investigation are reported in writing. The report of the investigator will be discussed in the SC.
- If a first assessment of the situation does raise serious doubts, notification will be given to the external accountant. Notification has to be based on concrete evidence and supporting documents. Anonymous messages or “rumours” are investigated but do not count as evidence.
- In principle, WfWP will report “proven” fraud or corruption to the appropriate authorities.

Additionally, on an annual basis, WfWP’s own accountant will be requested to do a random check based on year accounts and auditors reports of member organisation(s) involved.

Sanctions

If the suspicion concerns a member or staff member the organisation or person will be suspended on a temporary basis. As soon as the fraud or corruption has been proved the suspension will be formalised.

If the suspicion of fraudulent behaviour concerns a supplier or contractor of WfWP and the suspicion is confirmed, the contract will be terminated immediately.

In case of proven corruption or mishandling of funds, the funds paid out can be reclaimed

3. Prevention and monitoring.

Efforts and measures have to be in balance with the risk and (expected) scale of possible corruption and the expected damage thereof.

In first instance the responsibility for preventing corruption and fraud lies with the contracted parties for implementation of the project/activity; a clause stating that and enforcing this policy and the code of conduct are part and parcel of the agreement(s).

Women for Water Partnership internally.

The Code of Conduct of WfWP applies to all members, staff and SC members (see attachment).

In addition to that, WfWP has a financial protocol and a complaints procedure.

Contract third party partners.

WfWP has a number of criteria and requirements built in all contracts with implementing members, partners, freelance staff and contractors.

- All contracts refer to the code of conduct (when applicable) and/ or this policy.
- The standard contract entails clear instructions on control and reporting.
- Large amounts will be paid out in instalments agreed beforehand after the appropriate reports have been received.

- Names of staff and experts are published to prevent favouritism.
- The final report has to contain information on ownership of goods, installations and responsibility for management and maintenance after completion of the project.
- WfWP reserves the right to inspect the project on location during and after the project implementation.