



**Hope of Refugee Women against poverty for the Social Wellbeing
(HOPDEV)**

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HOPDEV Anti- fraud, Irregularity and Anti-Corruption Policy

Introduction:

HOPDEV management and staffs are personally and collectively motivated & committed for upholding and promoting the highest ethical and professional standards in their work. Everyone has a commitment to prevent fraud and corruption and unethical business practices. The various policies and internal control & monitoring system of HOPDEV are strong guard against occurrence of any corruption, fraud and financial irregularities.

The management of all levels has a responsibility to ensure that all personnel are aware of this Counter fraud, Irregularity and Anticorruption Policy, understand what it means in concrete behavioral terms and conceptualize how it applies to their program context.

HOPDEV has the zero-tolerance approach to corruption, fraud and financial irregularities. HOPDEV personnel shall never take advantage of their position when working with communities, partners, vendors or/and other stakeholders.

2. Definition of Corruption, Fraud & Financial Irregularities:

a. Corruption: Corruption is the offering, giving, soliciting or acceptance of an inducement or reward, which may improperly influence the action of any person. Corruption, associated with other unethical behaviors, covers a range of practices including:

- * Conflict of Interest
- * Fraudulent Commission
- * Undeclared Gift
- * Bribery
- * Misappropriation of Fund
- * Abuse of Authority

* Undeclared Nepotism and favoritism.

b. Fraud:

Fraud is an intentional distortion, deceit, trickery and perversion of truth or each of confidence, relating to an organization's financial, and material or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage. Fraud covers a range of practices including:

- * False representation
- * Hiding information

C. Financial irregularities

Financial irregularities mean any administrative or financial mismanagement that comes about either by act or omission by finance personnel, which has or would have the effect of prejudicing the fund(s) of the organization or project managed by them, by charging an unjustified item of expenditure. The financial and programming irregularities refer, but are not limited to:

- * Any dishonest or fraudulent act or violation of HOPDEV policies or clause/clauses in the signed Agreement with donor or partners; Forgery or alteration of any document or account (including but not limited to timesheet, payroll and associated leave records and accounts, travel and expense reports, advance reports and account, procurement documents, inventory records);
- * Forgery or alteration of a check, bank draft, or any other financial documents;
- * Misappropriations of funds, commodities, supplies, spare parts, project materials and equipment, or other assets;
- * Impropriety in the handling or reporting of money, financial transactions, or bidding procedures;
- * Accepting or seeking anything above nominal material value from vendors or persons providing services/materials (this does not apply to calendars, agendas, etc.);
- * Destruction or misappropriation of records, furniture, fixtures, or equipment;
- * Diversion, alteration, or mismanagement of documents or information, and/or any similar or related irregularity.
- * Unauthorized deduction or underhand dealing with any party.

Key Principles of HOPDEV:

HOPDEV's general attitude to corruption, fraud and financial irregularities:

- * Always prevent
- * Never accept
- * Always inform
- * Always act.

Key Principles of HOPDEV.

HOPDEV mitigation measures against corruption, fraud and financial irregularities In practical implementation, HOPDEV will take the following mitigation measures:

- * Promote the implementation of this Counter fraud, Irregularities and Anti-corruption Policy by contributing towards the creation and maintenance of an environment that prevents corruption and unethical business practice.
- * Report immediately any knowledge, concerns or substantial suspicions of breaches of the Policy to her/his manager and/or senior management of the offices who is expected to take prompt investigative action.
- * Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in the provision of goods and services in the execution of their job.
- * Strengthen downward accountability practices as a way of preventing and detecting corruption;
- * Give attention to setting up good financial, administrative, procurement and human resources systems from the very beginning of a project/ programme.
- * Part of external auditors' statutory duties is to ensure that HOPDEV has adequate arrangements in place for the prevention and detection of fraud, Irregularities and corruption. Complaints of fraud, Irregularities and corruption can be taken directly to external auditor.
- * Introduce internal checking system by the organization finance team.
- * Cooperate when requested with any investigation into alleged breaches related to this Policy. Measures when there is cause to suspect corruption or receive complaint when corruption, fraud and/or financial irregularities are suspected or complaint received, HOPDEV will take the following measures:

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- * If HOPDEV gets any complaint of corruption, fraud activity or any unethical business practice against any personnel, board members, temporary personnel, implementing partners, consultants and volunteers during their mission with HOPDEV, the organization shall take it immediately under investigation for prompt action.
- * Any complaint against any fraud, corruption or unethical business practice will be handled in line with the HOPDEV complaint and response mechanism.
- * Engage in a dialogue on how to investigate the suspected corruption /fraud / irregularity.
- * The complaint will be handled with an open mind and in confidentiality. Name and contact details will not be revealed to any person outside the investigation.
- * If corruption/fraud/irregularity is proved, disciplinary and/or legal actions will be taken immediately. If a complaint is proved malicious, any investigation underway must be stopped immediately and disciplinary actions will be taken