



Anti-Fraud and Anti-Corruption Policy

PURPOSE OF THE POLICY:

This policy sets out the responsibilities of managers, employees and volunteers in the event of fraud or corruption. The principles and definitions in this policy also extend to relationships Meeting Point International (MPI) has with Implementing partners and other organizations working with MPI.

ANTI-FRAUD AND ANTI-CORRUPTION POLICY INTRODUCTION

To ensure that MPI continues to have high standards of accountability, it is important that clear guidance is given to employees and volunteers on how fraud and suspected fraud is to be dealt with. This policy statement sets out the responsibilities of managers, employees and volunteers in the event of fraud or corruption. MPI has a zero tolerance to fraud and corruption and requires staff and volunteers at all times to act honestly and with integrity and to safeguard the assets for which they are responsible. Fraud and corruption are an ever-present threat to MPI's assets and reputation and so must be a concern of all members of staff and volunteers.

The scope of this policy applies to all MPI employees and volunteers. The principles and definitions in this policy also extend to relationships MPI has with National Organizations and external organizations (including, without limitation, implementing partners, contractors and donors).

WHAT IS FRAUD AND CORRUPTION?

The term fraud is used to describe a whole range of activities such as deceit, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. It involves the act of deceit of the organization in order to obtain a personal or collective advantage, avoid an obligation or cause loss. Corruption involves the act of dishonestly obtaining an advantage from a third party by abusing an entrusted power for private gain. Neither fraud nor corruption are restricted to monetary or material benefit, but could also include intangible benefits such as status or information.

RELATED POLICIES AND PROCEDURES

This policy should be read in conjunction with the MPI code of conduct

MPI takes the most serious view of any attempt to commit an act of fraud or corruption by members of staff, volunteers, contractors, their employees and agents acting on her behalf. Employees and volunteers involved in fraud and corruption of any kind will be subjected to disciplinary action within the organization and may be reported to external authorities for criminal prosecution, if appropriate. MPI treats an attempted act of fraud or corruption as seriously as an accomplished act.

RESPONSIBILITIES

MPI is committed to preventing fraud and corruption from occurring and developing an anti-fraud and anti-corruption culture. To achieve this, MPI will:

- Develop and maintain effective controls to prevent fraud and corruption
- Ensure that if fraud occurs, a vigorous and prompt investigation takes place
- Take appropriate disciplinary and legal action in all cases, where justified
- Take all appropriate and reasonable steps to recover any financial losses, and
- Review systems and procedures to prevent similar fraud(s)



MANAGERS' RESPONSIBILITIES

The day to day responsibility for the prevention and detection of fraud rests with the office coordinators who are responsible for:

- Identifying the risks to which systems, operations and procedures are exposed
- Developing and maintaining effective controls to prevent and detect fraud
- Ensuring that controls are being complied with

Office Coordinators are responsible for reporting all cases of fraud and corruption to the Executive Director

STAFF RESPONSIBILITIES

All staff are responsible for:

- Acting with propriety in the use MPI's assets resources
- Conducting themselves in accordance with the principles set out in the Code of Conduct
- Alerting their line manager where they believe the opportunity for fraud or corruption exists
- Reporting details immediately to their line manager of

(a) any suspected or actual fraud or corruption

(b) any suspicious acts or events which might give rise to a suspicion of fraud or corruption, to their line manager

If for any reason a member of staff does not feel able to report a suspected fraud or corruption to their office coordinator, a more senior manager (Technical Advisor) or the Executive Director should be informed. Staff should refer to the MPI Whistle Blowing guidance where they do not feel able to report suspected fraud or corruption to line management or are not satisfied that their concerns have been addressed

- Assist in any investigations by making available all relevant information and by cooperating in interviews

THE FINANCE MANAGER (TECHNICAL ADVISOR) IS RESPONSIBLE FOR:

- Establishing the internal control system designed to counter the risk of fraud and corruption and ensuring the adequacy and effectiveness of this system.

Together with the coordinator officers:

- Ensuring that the risk of fraud has been properly identified and assessed by management.
- Assessing that the internal control framework has been properly designed to address the risk of fraud and that it is working effectively.
- Ensuring that there are arrangements in place for investigation of all suspected and alleged fraud or corruption.
- Maintaining a fraud and corruption register.
- Reporting all cases of fraud and corruption to the Country Representative, and Financial Audit Team.
- providing a counter-fraud support service to management to help reduce exposure to fraud risk.

TRAINING AND DISCLOSURE PROGRAMME

- MPI shall develop and conduct a training programme aimed at:
 - i) increasing awareness of the risks of fraud and corruption; and



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ii) developing skills for understanding, detecting, preventing and reporting such practices.

- Participation in such programme shall be mandatory for all MPI staff. Refresher courses will have to be undertaken every three years.
- In addition, MPI shall implement ongoing employee training tailored to specific positions within MPI, with the aim of enabling such personnel to detect, prevent and promptly report any practices that are contrary to the Policy.
- Completion of the above training requirements shall be monitored by MPI.

External Audit

The External Auditor is under the obligation to report any cases of fraud or presumptive fraud or wasteful or improper expenditure of MPI's money or other assets, thereby contributing to the objectives of the Policy.

Rose Busingye

The Executive Director



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Kampala, 06 February 2019

Per Acceptance