



Swedish Committee
for Afghanistan

ANTI-CORRUPTION POLICY AND INSTRUCTION

Approved by Andreas Stefansson, Secretary General 2021-03-19

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1 ANTI-CORRUPTION POLICY

1.1 Background and Introduction

In Afghanistan, corruption is both a driver and consequence of poverty, disempowerment, and conflict. In Sweden, usually ranking high on anticorruption indexes, cases of fraud and corruption still occur. It is of utmost importance that SCA upholds a strong level of trust, underpinned by a high level of accountability, among target groups, communities, donors, government institutions and members. SCA has a duty to remain committed and implement effective anti-corruption strategies.

SCA aims to continuously strengthen its processes and systems for accountability and transparency. The corruption reporting mechanism and investigation procedures underwent a significant restructuring in 2017. Since then, practices and functions have found their form and adjustments were made in 2020 in the reporting lines of Internal Audit Unit.

Part one of this Anti-Corruption Policy reaffirms SCA's long-standing zero tolerance for all forms of fraud and corruption. The stance is founded on the core values of SCA, *responsiveness, impartiality, equality, social justice, and integrity*.

Part two, the instruction, guides the practical assessing, investigating, and reporting of irregularities.

1.2 Approach and Strategy in Anti-Corruption

SCA emphasizes preventive measures to minimize the opportunities for corruption. Great importance is placed on maintaining both values and robust systems for monitoring.

The overall strategy to counteract corruption is to apply multiple forms of monitoring and checks in all systems for finances, logistics, procurement, payroll, staff policies and programmatic implementation. Decision-making must be transparent, the organization must be open regarding challenges, and continuously learn from experience, both positive and negative.

A broad acceptance for zero-tolerance of corruption needs to be gained through good management, an equitable work environment and competitive salaries. This is combined with clear procedures for disciplinary action whenever corruption is exposed.

1.3 Scope of Policy

All staff, on all levels, and non-staff such as volunteers, members and board members, contracted partner organizations and their staff, consultants for SCA, and suppliers are bound by this policy.

1.4 Definitions

In this policy, the term “**corruption**” is used both in a wide descriptive sense, such as in the title, but also narrowly referring to abuse of entrusted power for private gains.

The term “**fraud**” refers to the actual or attempted use of deceit, falsehood, or dishonest means (including willful omission) to secure direct or indirect financial or material gain, personal advantage, or other benefit, and includes fraudulent conduct, corrupt conduct, collusive conduct, coercive conduct, and obstructive conduct. It also includes attempts of any of the above, even if unsuccessful.

Fraudulent conduct - any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. As such fraud can include embezzlement of funds, forgery, counterfeiting of documents, theft, nepotism (the practice favoring relatives or friends), deception, misappropriations of designated funds and assets, concealment of material facts and misuse of funds and assets for other purposes than that stated in donor agreements.

Corrupt conduct - the abuse of authority for private gains or satisfaction by offering, giving, receiving, or soliciting, (directly or indirectly), anything of value to benefit or to influence improperly the actions of another party.

Collusive conduct – the proposing or entering an arrangement between parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

Coercive practice - impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party for private gains or satisfaction.

Obstructive conduct – is (1) any act which deliberately and in an effort to compromise an investigation, destroys, falsifies, alters or conceals information or documents that may be relevant to a fraud and corruption investigation, or material that could become evidence; or (2) the making of false statements to investigators during such an investigation.

Zero-tolerance – SCA will always pursue and never accept proven fraud or corruption. SCA will always prioritize to investigate suspected corruption. However, it does not mean that all allegations/actions are treated with the same disciplinary measures. The severity, intention, context, and possibility to establish reasonable proof will determine each case.

The scope of this policy does not include conduct or procedural lapses of staff made without intended or actual personal gain, contracted partner organizations and consultants that do not fall within the scopes defined above (e.g. harassment, mismanagement, disrespectful behavior and breaches of legal and contractual obligations not involving fraud, corruption, coercion or collusion). SCA has policies and practices in place to deal with such lapses, which include provisions for their investigation and for the application of appropriate actions or solutions.

Although itself not covered by this policy¹, SCA recognizes that harassment may be used to hide corruption (or be one of many factors in any case of corruption) and may take indirect paths such as backstabbing and undermining colleagues to reduce their trustworthiness. Sexual harassment or services (sextortion) may also be the currency used in corruption or extortion. Harassment may also be an indicator of corrupt practices within a location or unit.

1.5 Expected Conduct

It is the duty of all SCA staff to uphold zero-tolerance on corruption. SCA staff are never to engage in fraud, corrupt, collusive, coercive, or obstructive conduct. Doing so fundamentally counteract the rights of our target groups and the vision, mission, and values of SCA. All staff must be aware of and disclose whenever faced by conflict of interest.

All staff have a duty to report incidents of suspected corruption to either a superior or directly through the SCA whistle-blower mechanism. Not doing so may lead to disciplinary action. However, staff should act responsibly, keeping in mind the Code of Conduct, and refrain from unfounded reporting, rumors and gossiping. Managers have a duty to report and reduce the risk for breaches.

Fraud against SCA, or others when representing SCA, **will constitute misconduct and will be grounds for dismissal.**

Suppliers of goods and services that engage in fraud **are not accepted and will have their contracts terminated.**

Fraud against others may **disqualify such vendor or civil society partner from further engagements with SCA.**

Whenever relevant SCA will act to recover losses. **This may include referral to law enforcement authorities for criminal investigation or filing of lawsuits.**

1.6 Reporting

All substantial suspicions of corruption relating to SCA must be reported via the whistleblower mechanism, or by other available channels, to the Anti-Corruption Committee (ACC) as soon as possible. Reports should always be as thorough and specific as possible, providing evidence or sufficient details for further investigation. Whistleblowers are encouraged to share means of contact.

Anyone reporting suspected corruption must act in good faith and must have reasonable grounds to believe in the information. Intentionally making a false or malicious allegation is considered obstructive conduct and may result in disciplinary action. Unintentional errors or misunderstandings in a complaint will not lead to repercussions or have other consequences.

¹ For this instead please refer to the *SCA Harassment Free Workplace Policy*

All reports submitted to the ACC will be assessed. ACC will ensure the confidentiality of any reported suspicion.

1.7 Whistle-blower Protection

Fear of appearing disloyal or concerns about being the subject of reprisals, may discourage individuals from reporting misconduct.

No individual should be disadvantaged for whistleblowing. SCA has an obligation to ensure that a complainant is not pressured or subject to other reprisals. SCA is committed to maintain an environment in which legitimate concerns can be reported without fear of retaliatory action or retribution.

The identity of a whistleblower should remain confidential to the extent permitted by law. SCA will treat any retaliatory reprisal, harassment, or victimization as serious breaches of this policy.

1.8 Disclosure; Confidentiality; Public Statements

A whistleblower is defined as an individual who reports about an activity which that person believes to be fraudulent or dishonest. All disclosures relating to reports that SCA may have been the victim of fraud and the status of SCA's response will be made in accordance with the following principles:

- To ensure the probity of any investigation, to maximize the prospect of recovery of funds, and to respect the due process rights of all involved, information relating to reports of fraud and investigation and handling of such reports is to be treated confidentially and with utmost discretion even within SCA.
- All cases of investigated irregularities will be reported to the SCA Board, presented in the annual report, and reported to concerned donor as per donor agreement.
- Specific corruption reports sent to donors may be accessible to the Public by law.

2 INSTRUCTIONS

The following section of this document is the procedure manual for implementation of the SCA Anti-Corruption policy. It includes guidelines for the SCA whistle-blower mechanism, how to assess suspected corruption, when and how to report, and responsibilities.

2.1 Roles and Responsibilities

The Board of SCA

The SCA Board is SCA's supreme decision-making body between Annual Meetings and is accountable towards the members of SCA for all operations, including anti-corruption. The Board follows up findings related to audits, quality assurance in operations and anti-corruption mechanisms.

The Secretary General (SG)

The responsibility and full authority for all work against corruption and ownership of related processes, lies with the Secretary General. SG leads and oversees the work in the ACC. SG can at any moment over-rule Country Director decisions, initiate re-examination of any case, request further documentation, revoke delegations etc.

The Anti-Corruption Committee (ACC)

ACC consists of Secretary General, Country Directors / Afghanistan and Sweden, and Internal Audit Manager. Senior Strategic Advisor has delegated authority on behalf of SG. The Anti-Corruption Committee should convene monthly, summoned by Internal Audit Manager who also prepares agenda, decisions, board, and donor reports. Other staff may be invited to participate in ACC meetings following SG approval.

- ACC is responsible for assurance of quality and internal compliance in the SCA anti-corruption work.
- ACC monitors the process and implementation of investigations, results and measures taken, and when appropriate itself take measures.
- ACC ensures reporting to board and donors according to regulations and agreements.
- ACC ensures that regulations and mechanisms for reporting and investigating are updated and relevant.
- Training and information materials are developed under the responsibility of ACC.

Internal Audit Unit

IAU is central to all Anti-Corruption activities and are guided by their own charter, professional standards, and law. IAU undertakes all forensic investigations on cases of suspected corruption, presenting conclusions and recommendations to CD and SG. IAU ensures the functionality and integrity of the SCA whistle-blower mechanism.

IAU analyzes and reports on the overall status of Anti-Corruption capacity and awareness within SCA. IAU oversee training and offer expertise and is responsible for maintaining training material on anti-corruption and do training of trainers.

Country Directors

The responsibility for implementing these instructions and the complaint mechanism manual is delegated to the Country Directors in Afghanistan and Sweden. The Secretary General may at any point revoke this delegation (e.g., in cases of conflict of interest).

- CD/A and CD/S must ensure that modes /channels are functional, secure, and available for anyone wanting to report irregularities.
- CD/A and CD/S must ensure that this Anti-Corruption Policy and Instructions are accessible (in staff members language) and well-understood.
- CD/A and CD/S must ensure that all reports are assessed, investigated when possible, documented and filed.
- CD/A and CD/S must ensure that SCA always has either a valid and signed MoU with qualified audit firms, or a valid framework agreement, enabling a forensic audit to be undertaken with short notice.

Directors, Heads of RMO's and SMO Managers

- Shall ensure that subordinate staff are aware of and understand the Anti-Corruption Policy, are aware of what constitutes corruption, as well as mitigation, detection, and procedures.
- Shall impartially investigate any case handed over to them by CD for investigation.
- Shall not carry out investigations on their own, but report any suspected incident reported to them using the whistle-blower mechanism. They could be assigned by the CD to investigate a case, but only once the complaint is assessed by IAU / ACC.
- Head of RMOs are to ensure that physical whistle-blower complaint boxes are in place, secure, and functional.
- Head of RMOs are to ensure that unit/project managers implement and maintain the anti-corruption mechanism in all SCA projects, and that staff, beneficiaries, partners, and other stake holders are informed and able to access the complaint mechanism.

Unit/Project Managers

- Project managers are to ensure that SCA target groups, as far as possible, are aware of the zero-tolerance of corruption, are aware of and have access to the anti-corruption whistle-blower mechanism. Information should be available in all projects via the fraud awareness charts and anti-corruption brochure.
- Line managers are to ensure that responsible implementing staff are informed about donor requirements related to anti-corruption, at the start of each project.

- Project managers are to ensure that all relevant contractual agreements with donors, including the ones relating to anti-corruption, are reflected in agreements with third parties such as partner organisations, suppliers, consultants etc.
- Unit heads are responsible for building the capacity of staff with regards to anti-corruption. Anti-corruption trainings should be held annually and be part of the Annual Action Plan for the unit. Unit heads should coordinate with IAU for best timing of regular trainings.

2.2 Whistle-blower Mechanism and Corruption Complaints

The following mechanisms shall always be in place to receive information/complaints:

1. Email: sca-fightcorruption@sca.org.af
2. Telephone hotline to SCA Internal Audit Manager: 0093 705 031 742. One can send SMS or voice messages which will be recorded.
3. Corruption complaint boxes in all SCA offices in Afghanistan.
4. Whistle-blower mechanism via SCA website sca.org.af and sak.se

Anyone can talk to their manager, director or SCA country director and inform them of suspected corruption. Informing a higher authority within SCA never requires an approval from the line manager. Any manager receiving verbal complaints regarding corruption must document the complaint and send it to the ACC via one of the above four mechanisms.

Reports should always include available specifications such as dates, staff or partners believed to be involved, description of incidences, why it is believed to be a case of corruption, copies of any hard evidence or suggestion where such could be obtained.

2.3 Receiving and Filing Corruption Complaints

Complaints must always be formally managed and registered through the Complaint Mechanism Log. The only exceptions would be spam e-mail advertising, junk mail, etc.

SCA Internal Audit Unit (IAU) has delegated responsibility to manage all corruption complaints received from the above mechanisms.

The IAU is responsible to

- Secure access to and regularly empty SCA complaint boxes installed at SCA offices.
- Manage the communication via email, telephone hotline and SCA website.
- The SCA Internal Audit Manager (IAM) is to immediately register complaints in the anti-corruption log and inform relevant CD (copy the ACC) about the new complaint.

ACC members have full access to the log and all documentation associated with reported or investigated cases.

The CDs have delegated authority from the SG to immediately start assessment. The CDs may seek guidance from the ACC and the SG may at any time decide to inform the Board, Press secretary and / or Donors.

Corruption detected in system audits, accounting procedures and other regular assessments, should be reported through the corruption complaints mechanism, either by the victim, auditors, or by the unit carrying out the system audit, processing, or assessment.

2.4 Assessing Corruption Complaints and Deciding on Action

In Afghanistan, initial assessment of allegations (Initial Predication) is done by Country Director Afghanistan, Head of Internal Audit Unit (HIA) and any other staff member(s) requested to participate by the CD or HIA.

In Sweden, initial assessment is done by Country director Sweden and Secretary General. Other staff at the discretion of CD/S.

There are two levels involved when handling reported allegations in SCA and these are explained below:

First level of assessment is to determine whether the complaint is possible to investigate at all, considering the details given, and/or whether the issue has already been resolved. A qualified complaint will go to the second level of assessment. Claims that are deemed not possible to investigate will be kept in the database in case more information comes in.

Guide: First Level Assessment		
Question	Conclusion	Action
1.1 Is sufficient information included on SCA units, location, and staff, or related organisations and individuals, to act?	If 1.1 is true, the complaint qualifies for the second level.	Proceed to second level for investigation.
1.2 Does the compliant not provide any information to act or the source is unknown to be able to get more information?	If this is true, the complaint is registered for the records as a suspected incident, and no further action needs to be taken.	Complaint is closed at first level and documented.
1.3 Does the report not relate to corruption, but rather to harassment/ Code of Conduct breach etc?	The complaint is registered for the records as a reported non-corruption incident.	Case referred by CD to the responsible manager/unit for further action. Complaint is closed (as case of corruption) and documented.

At the second level of assessment

The second level of assessment entails analyzing the context of the complaint.

- The complaint may initially appear minor, and only later turn out to be one in a series of corruption complaints regarding the same location, project, or staff.
- The complaint may closely relate or be identical with a case already under investigation, or it may be the continuation with further identified breaches of an already finalized investigation.
- The assessment may indicate that a forensic audit investigation or a system audit on the site is required.

The second level of assessment will also entail to broadly determine the category of complaint to determine further action. A qualified complaint may refer to several categories, they are not mutually exclusive, which should be taken into consideration in the decision to proceed.

Investigation category(s):

Category 1: Breach of Policy

Category 2: Implementation of programmes, operational wrongdoings, waste or miss-use SCA resources in project implementation

Category 3: Human Resources / recruitment

Category 4: Procurement, financial management, storage or supply chain management and misuse of SCA resources .

Whenever a complaint or suspicion reaches level 2, and the context and category of the complaint or suspicion has been determined, an investigation is initiated and notification must be sent to ACC, the Board and relevant donors.

Should Country Director for any reason not want to act, limit, or postpone action, ACC must be consulted, with documented justification and risk analysis. The course of action must be approved by SG.

2.5 Investigating corruption

IAU develops Terms of Reference (see annex). Whenever an external investigator is contracted the Country Director may use other process or means of preparing a Terms of Reference.

After Investigation Terms of Reference have been approved by the Country Director, the investigation may commence.

Most investigations will be conducted by the Internal Audit Unit, but the CD/A may delegate minor cases (not formal forensic investigations) to Head of RMOs and/or Unit Heads.

During the process no one involved in the investigation may disclose any details on the process or information that has been communicated. Interviewees should be made aware that any disclosure may be considered as an obstructive practice of corruption. The investigation team may ask for written guarantee from involved staff members.

All investigations must be documented in investigation reports, which are not final until approved by the Country Director.

2.6 Decision on result from investigation on corruption

When the investigation report is finalized and approved by the Country Director, the Country Director decides on further action.

The Country Director assesses whether a formal legal process should be initiated, based on the investigation and a documented risk assessment. The assessment must be documented. CD/A may never initiate a formal legal process in Afghanistan without consulting ACC in advance. SG must approve of initiating formal legal procedures in Afghanistan. At ACC meetings, the anti-corruption log is jointly reviewed to ensure shared understanding of and follow up on all investigations. Secretary General may at this time also give specific instructions related to specific cases for follow-up in the organization. ACC should draw overall conclusions on how to further prevent corruption and misconduct.

2.7 Information and Action on corruption investigations

Pre-investigation information

- 1) Whenever a new case qualifies per the 2nd level assessments and an investigation is initiated, CD will in writing send an **early notification to inform ACC and the contract holder** at ACU or PMER, through the Head of ACU or PMER, about the nature of the suspicion and investigation.
- 2) The contract holder will immediately send **the early notification to the relevant donor(s)** in line with the agreement(s).
- 3) Should a case carry a considerable reputational risk, SG may establish a Crisis Group based on the SCA Crisis Management organisation.
- 4) The **SCA Board** is given the corresponding early information in the quarterly IAU reports.

Post-investigation information

- 5) Once Country Director has approved **Donor Report on Corruption**, including management response, it is submitted to ACC and SG.
- 6) The Country Director informs the complainant and the alleged perpetrator that the case has been investigated and give a brief information on the outcome.
- 7) After ACC review and SG approval the *Donor Report on Corruption* is shared with the Board by SG and with the donor/s by the manager responsible for the grant management.

- 8) The Country Director ensures that disciplinary action is taken according to regulations. CD may take any other action considered necessary. Information is filled in the personnel file of the SCA staff who has been disciplined. Those terminated or asked to resign due to corruption will be automatically disqualified for recruitment with the SCA.

2.8 Closing of corruption case

A case may be closed after it has been investigated and all appeal rights are exhausted. However, reclaiming financial losses, undertaking legal proceedings etc. may lead to some cases not being completely closed until after a substantial time. The Secretary General may at any time decide to re-open a previously closed case for further review.

All documentation should be stored with IAU according to relevant legal regulations.

2.9 Maintenance of the Anti-Corruption system

Maintenance includes:

1. Updating policy and implementation guidelines.
2. Technical updates of Corruption Complaints Mechanism.
3. Updates of training and information materials.
4. Ensuring organisational capacity to manage incidents.
5. System monitoring and reporting.

ACC oversees that the system is maintained. IAU is operationally leading the five maintenance tasks above. IAU is mandated to liaise and collaborate with any relevant unit in SCA.

The Anti-Corruption Policy and Anti-Corruption procedures and complaint mechanism manual will be reviewed every second year and will be included as part of the Organisational Assessment ahead of each Strategy Planning processes.

ANNEX 1: POTENTIAL RISK AREAS

SCA views the following key areas as areas of particular risk, but also recognizes that there are other actions that constitute fraud which not specifically mentioned here.

Financial Management systems and procedures:

- Financial fraud and embezzlement.
- Forgery and falsification of signatures.
- Intentionally improper accounting.
- False, duplicate, or inflated invoices or receipts.
- Manipulating audit process or final audit reports.
- Payroll and claims fraud.
- Withholding of SCA financial resources for private use.
- Manipulating financial documents.
- ‘Double-dipping’ or seeking or accepting funds from more than one donor for (or parts of) the same project.
- Violation of existing financial management procedures for private gains.

Site selection and implementation:

- Biased project site selection: Staff favoring an area according to political, religious, ethnic, tribal affiliation or to satisfy elites.
- “Ghost beneficiaries” and “ghost project” sites.
- Inflating needs assessment, budget, or beneficiary numbers to justify the site selection or corrupt diversion of surplus resources.
- Manipulating statistics to justify SCA continuous support of the projects or to show success in implementation.
- Selecting implementing partners based on biased decision and justifications.
- Biased supervision and monitoring of projects; hiding facts and covering failure and waste of resources.
- Diversion of resources during distribution or supply to projects.
- Gifts from communities or project implementation staff during field visits.

Procurement, supply, and supplier relations:

- Manipulating tender specifications/bidding documents: Specifications skewed to suit one supplier.
- Presolicitation Phase – Need recognition schemes and bid tailoring schemes.
- Solicitation Phase – Prematurely opening bids, altering bids and extending bid opening dates without justification.
- Performance and Administration Phase – Product substitution.
- Biased supplier prequalification: Suppliers may be invited to tender even if they do not meet pre- qualification criteria.
- Biased disqualification of suppliers: Supplier may be disqualified based on irrelevant justification to pave the way for preferred supplier to win contract.

- Collusion among suppliers – complementary bids, bid rotation, bid suppression, market division, market division and phantom bids (bids from shell companies).
- Manipulated bid evaluation, contract award and contract execution.
- Surplus procurement (which could be considered waste of resources).
- Supply of sub-standard goods or services.
- Unauthorized use of material and goods.
- Kickback arrangements in procurement, before or after procurement deal.
- Giving surplus material and equipment to subordinates or donated to other organization without getting approval from the SCA management.
- Intentionally receiving expired goods from suppliers in exchange for kickback or favors.
- Exchange of SCA quality goods with low quality in exchange for kickback or favors.
- Classifying functional item or quality goods/material as scrap or junks material (waste).
- Accepting gifts or favors from suppliers or potential suppliers, including entertainment, food, or leisure activities, including participation in relations-building conferences, travel etc

Human Resources Management:

- Biased recruitment.
- Biased promotion or provision of development possibilities which are not based on need or justified.
- Biased support of staff due to relation, favours, receiving gifts or other benefits
- Extortion, intimidation, coercion, or discrimination based on e.g., ethnicity, gender, hierarchy.
- ‘Ghost’ employees, participants, or beneficiaries that inflate the costs of projects
- Kickback arrangements in hiring of staff.
- Time killing: Not working the number of hours agreed upon in the employment contract or other steering documents. Not reporting absent days or leaving early without compensating it by other approved means.
- Disclosing of SCA personnel information, salary scales or other human resource document to other SCA employees or any other external body without obtaining SCA management approval and individual employee agreement.
- Providing false employment certificates.

Transport/Administration:

- Unauthorized private use of SCA vehicles.
- Diversion of fuel and old spare parts.
- Use of SCA material and human resources for private purpose or favour.
- Repair and maintenance of SCA vehicle(s) externally if the SCA workshop could provide similar service.
- Using SCA name and reputation for private benefit toward other organisations or governmental offices.
- Import and export any item/material wrongfully under the name of the SCA.
- Provision of gifts or favoring government employees to obtain their support for obtaining visa, registration etc.

Information, communication, and technology systems:

- Use of SCA IT and communication technologies for private and personnel gains.
- Unauthorized sharing SCA working data with external bodies or individuals for private gain.

Members association and Board:

- Members or Board members being paid for consultancy services.
- Members or Board members being reimbursed for expenses such as travel, or per diem, by SCA while also being reimbursed by other organization or employer.

ANNEX 2: INVESTIGATION TERMS OF REFERENCE

SCA INTERNAL AUDIT UNIT

Case Details: *(Summary of the allegations)*.

Case Number – *(Indicate Case Reference Number)*.

Planned Start Date: *(Indicate Planned Investigation Start Date)*.

Planned End Date: *(Indicate Planned Investigation End Date)*.

1. INTRODUCTION AND BACKGROUND.

(Summary of the case).

Multiple categories may apply

Category 1: Breach of Policy

Category 2: Implementation of programmes, operational wrongdoings, waste or miss-use SCA resources in project implementation

Category 3: Human Resources / recruitment

Category 4: Procurement, financial management, storage or supply chain management and use of SCA resources .

2. INVESTIGATION METHODOLOGY.

(Specify the investigation approach to be followed).

3. INVESTIGATION TEAM.

(The Investigation Team is indicated under this section).

4. SUPPORTING POLICIES & DOCUMENTATION.

(Indicate the SCA Policies where criteria will be obtained).

5. DELIVERABLES.

(Indicate i.e., Final Investigation Report, Process Improvement Memo, where necessary).

6. ToR approved by Country Director.

(with date)

ANNEX 3: INITIAL DONOR NOTIFICATION

Case Ref # (YEAR)/(CASE #)	
Location: <i>(Office and Location).</i>	
Categories:	
<input type="checkbox"/> Category 1: Breach of Policy <input type="checkbox"/> Category 2: Implementation of programmes, operational wrongdoings, waste or miss-use SCA resources in project implementation <input type="checkbox"/> Category 3: Human Resources / recruitment <input type="checkbox"/> Category 4: Procurement, financial management, storage or supply chain management and use of SCA resources .	
Nature of corruption: <i>(What is alleged to have happened? Which individuals and/or institutions are involved or affected?)</i>	
Project: <i>(If applicable)</i>	
Donor: <i>(Indicate name of Donor).</i>	
Source of Allegation: <i>(How did SCA get to know about the allegation?)</i>	
Potential Damage: <i>(Is there an acute danger to life, or security of project staff, partners, or beneficiaries?)</i>	
Impact on Project Implementation: <i>(Is smooth implementation of the project affected?)</i>	
SCA Action: <i>(Indicate in this section that this is an initial report to the Donor and the investigation process has commenced or has been planned. The Donor will receive the final report after the conclusion of the investigation).</i>	
Approved by Country Director <i>(with date)</i>	

ANNEX 4: INVESTIGATION REPORT - TEMPLATE

CASE NUMBER: *(Indicate Case Reference Number).*

Case Details: *(Indicate Nature of Allegations).*

Date: *(Indicate Date).*

1. Background

(Indicate summary of the allegation(s))

2. Executive summary

(The results from the investigations, including evidence available, summary of findings and conclusion are presented in summarized form).

3. Scope and Objectives

(The scope of the investigation and the extent of investigation coverage is indicated in this section).

4. Scope Limitation.

(Any challenges which limited the scope of the investigation are outlined below for management attention).

5. Approach

(The various investigation procedures that were conducted are indicated under this section).

6. Findings

(The findings are indicated under this section).

7. Impact

(The financial impact or financial loss is indicated under this section as well as the funding source).

8. Recommendations.

(The recommendations are based on the findings established from the investigation process).

9. Management Responses.

(The management action plans to address the recommendations are provided under this section).

10. Approved by Country Director.

(The report is approved by Country Director, with date).

End of Report.

ANNEX 5: PROCESS IMPROVEMENT MEMO

Process Improvement Memo.

CASE NUMBER: *(Indicate Case Number).*

Case Details: *(The nature of allegations is outlined in summery).*

Date: *(Date of Report).*

Approved by:

REC NO.	OBSERVATION	RISK	RECOMMENDATION	MANAGEMENT RESPONSE
A	(Process)			
1.	<i>(Internal Control Gap).</i>			
	<i>(Summary of internal control gap).</i>	<i>(Risk of the internal control gap).</i>	<i>(What management must do to close the gap).</i>	<p><u>Action Plan:</u></p> <p><u>Process (Goal) Owner:</u></p> <p><u>Implementation Date:</u></p>