

CCARDESA

Centre for Coordination of Agricultural Research and Development for Southern Africa



CCARDESA FRAUD AND IRREGULARITIES POLICY

January 2017

1. BACKGROUND.

- 1.1 The CCARDESA Fraud and Irregularities policy sets out a framework for prevention, identification, reporting investigation and resolution of allegations of financial irregularity and/or fraud made against employees and/or others associated with CCARDESA.
- 1.2 CCARDESA aims to reinforce its risk management strategies by formalising its position on fraud and irregularities through the implementation of this fraud and irregularities policy. CCARDESA, with all its governance structures, supports and fosters a culture of zero tolerance to fraud and irregularities in all the activities that it carries out and those for which it has supported or collaborating on.
- 1.3 It is the intent of CCARDESA Secretariat to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct investigations.

2. SCOPE OF THE POLICY

- 2.1 The policy is applicable to all activities and operations of CCARDESA, including CCARDESA funded programmes and projects services provided by CCARDESA to other organisations and management service agreements. It is also applicable to any activities in which CCARDESA is directly involved or providing any level of technical or financial support.

3. FRAUD AND IRREGULARITIES DEFINITIONS.

CCARDESA defines fraud following the Institute of Internal Auditors International Professional Practices Framework (IPPF) which defines it as: “**Misappropriation, irregularities and illegal acts characterized by deceit, concealment or violation of trust**, as further described below

- 1) Falsifying documents, making false statements, preparing false entries in the CCARDESA systems or other deceptive acts to the detriment of those someone seeks to disfavor, or to discredit a person, programme or CCARDESA Organization.
- 2) Providing information in relation to employment allowances, benefits claims or other entitlements that the claimant knows to be false.
- 3) Collusion or other anti-competitive scheme between suppliers and other service delivery providers during the procurement processes.
- 4) Seeking or accepting anything of material value for personal gain from contractors, vendors, or persons providing services/goods to CCARDESA.
- 5) Cash embezzlement, abuse and mismanagement of CCARDESA funds and other Assets.
- 6) Deliberate non-compliance with policies and procedures governing the operation of CCARDESA Secretariat.
- 7) Creating or failing to disclose conflict of interest while participating in CCARDESA procurement processes.
- 8) Theft of CCARDESA funds, Assets and other resources belonging to CCARDESA.

- 9) Misrepresenting CCARDESA employment status to obtain benefit from other stakeholders.
- 10) Making misrepresentations, including educational credentials, birth certificates, government's documents or professional qualifications on personal history form in the context of job application and requesting payments claims and other settlements to CCARDESA.
- 11) Failing to comply with donor-imposed restrictions pertaining to the use of gifts and other assets.
- 12) Forging the signature of a CCARDESA staff member or any other persons signature with intent to obtain personal benefit or mislead the organization.
- 13) Encouraging, concealing, conspiring or colluding in any of the above actions.
- 14) Any other fraudulent issues not specifically mentioned above

4. THE POLICY STATEMENT.

It is the policy of CCARDESA Secretariat to prohibit the commission of fraudulent activity by management, officers, employees and Interns and its partners and collaborators, as well as projects/activities that are technically or/and financially supported and administered by the CCARDESA.

Management of CCARDESA is responsible for establishing the cultural environment, guiding employees, Interns and any other relevant persons, assessing fraud risks, implementing internal controls and monitoring activities designed to prevent and detect the misappropriation of CCARDESA assets and intentional material misrepresentation of CCARDESA's financial or other data or other actions constituting fraud.

CCARDESA has zero tolerance for fraud and irregularities, meaning that CCARDESA staff members, non-staff personnel, vendors, implementing partners and responsible parties are not to engage in fraud or corruption. Any investigative activity required under this policy will be conducted without regard to the suspected wrongdoer's length of service, position/title or relationship to CCARDESA Management and governance structures.

5. REPORTING SUSPECTED FRAUD AND IRREGULARITIES.

- 5.1 It is the responsibility of all CCARDESA employees to carry out their work in such a way as to prevent fraud occurring in the workplace. Employees must also be alert for occurrences of fraud, be aware of unusual transactions and dealings or behaviors indicating fraud and report to the Executive Director. Should it be suspected that the Executive Director is involved, the report should be submitted to the Chairperson of CCARDESA Board of Directors.
- 5.2 If it is suspected that CCARDESA Board members are involved in fraud/irregular practices, the report should be directed to the Chairperson of committee of Ministers of Agriculture and Food Security through the office of Executive Secretary of SADC Secretariat.

5.3 Cases of suspected fraud may be reported either by email or printed document/letter through the following addresses:

1) By email to: fraudmailbox@ccardesa.org

2) By post marked “**Private and Confidential**” to:

The Executive Director,
CCARDESA Secretariat,
Private Bag 00357,
Gaborone,
Botswana

Physical Address: Plot 4701, Station Exit Road, Gaborone, Botswana.

5.4 Addresses of the Chairperson of CCARDESA Board and appropriate office for reporting CCARDESA related suspected fraud to the SADC Secretariat shall be published on the CCARDESA website.

5.5 Any act of concealment or failure to investigate/take action on any reported suspected case of fraud by management shall constitute a serious offence for which the Board will be required to take action.

6. DEALING WITH REPORTS OF SUSPECTED FRAUD.

6.1 Any suspicions of fraud will be taken seriously by the Executive Director and or Internal Auditor and reported to the Board of Directors. Managers at CCARDESA shall be expected to deal firmly and quickly with any reports of suspected fraud.

6.2 Upon receipt of any report of suspected fraud, the Executive Director or Chairperson of the Board or SADC Secretariat shall institute investigations immediately in order to establish the facts and decide on the action to be taken. Investigations may be done internally or referred to an appropriate law enforcement agency depending on the nature and degree of the alleged fraud committed.

6.2.1 Any fraud and corruption committed by an employee or any other person shall be subjected to thorough investigation and to the full extent of the law, including (where appropriate) consideration of:

- a) in the case of employees, taking disciplinary action within a reasonable period of time after the incident;
- b) instituting civil action to recover any loss;
- c) initiating criminal prosecution by reporting the matter to the relevant authority/Police Service or any other relevant law enforcement agency; and /or
- d) taking any other appropriate legal remedy available.

6.3 If the investigation results in a recommendation to terminate the employment contract of an individual, the recommendation will be reviewed for approval as per the rules and procedures contained in the CCARDESA Human Resources Policies and Procedures Manual.

7. CONFIDENTIALITY

- 7.1 CCARDESA shall treat all information received **and the source of the information,** strictly confidential.
- 7.2 Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected to have been involved in fraud, but subsequently found innocent of wrongful conduct and also to protect CCARDESA from potential civil liability.
- 7.3 In the event that a case of fraud is before a Court of Law for determination, such a matter shall not be discussed or commented upon publicly by those directly involved.

8. ADMINISTRATION.

The CCARDESA management is responsible for the administration, revision, interpretation and application of this policy

9. REVIEW OF THE POLICY

In the interest of maintaining best practice, the contents of this policy will be reviewed by the Board annually.

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