



MenEngage Alliance

working with men and boys for gender equality

CORRUPTION/FRAUD PREVENTION POLICY

MENENGAGE GLOBAL ALLIANCE

January 2017 (updated August 2018)

MenEngage Global Alliance, as guided by its core principles, code of conduct and accountability standards, has zero tolerance policy on fraud or corruption of any type or in any circumstances, whether carried out by persons associated with MenEngage Global Alliance or associated with member and partner organizations, consultants or clients, Board Members, national and regional representatives, staff, volunteers, or associated with suppliers, contractors or clients. This policy is applicable to MenEngage Global Alliance staff members, board members, national and regional representatives of the Alliance and organization, consultants and other third parties that are contracted to provide services to MenEngage Global Alliance.

Fraud against MenEngage Global Alliance depletes funds intended for the accomplishment of programme delivery, undermines effective functioning and jeopardises sustainable development by diverting donor contributions. Fraud in favour of MenEngage Global Alliance affects our reputation and ability to attract donations. Vigorous and prompt investigations will be carried out into all reported cases (complaints) of actual or suspected fraud. Any fraud or corruption violates *MenEngage Global Alliance's core principles, code of conduct and accountability standards*, hence will be dealt with highest standards including those of relevant member organizations.

1. Definition of Terms

Fraud / corruption: abuse of data, resources or services that a person has at their actual disposal for the performance of a duty for the benefit MenEngage Global Alliance, resulting from their employment MenEngage Global Alliance, or for the performance of the duties or the supply of goods. For the purposes of this policy, fraud shall include, but not to be limited:

- Theft or misappropriation for MenEngage Global Alliance assets.
- Submitting false claims for payment or reimbursement.
- Accepting or offering a bribe, or accepting gifts or other favours under circumstances that might lead to the inference that the gift or favour was intended to influence an employee's decision – making while serving MenEngage Global Alliance.
- Accepting a commission from, or paying same to a third party (kickbacks).
- Blackmail or extortion

- “Off Book” accounting or making false fictitious entries.
- Knowingly creating and / or making false or misleading financial reports.
- Payment for excessive prices or fees where justification thereof is not documented.
- Violation of foundation procedure with the aim of personal gain or to the financial detriment of MenEngage Global Alliance.
- A dishonourable, or irresponsible, or deliberate act against the interest of MenEngage Global Alliance.

2. Prevention and Monitoring

Staff members, Board members, National and Regional Chairs or Coordinators: are expected to prevent and combat fraud and corruption in MenEngage Global Alliance – donor supported projects. Possible actions include:

- Taking all appropriate measures to prevent fraud and corruptions in MenEngage Global Alliance donor supported projects, such as maintaining appropriate fiduciary and administrative arrangements.
- Raising awareness, making sure that the Fraud Prevention Policy is made available to project staff.
- Reporting allegations of fraud and corruption in connection with the use of grants from MenEngage Global Alliance and cooperation with MenEngage Global Alliance investigations.
- If Fraud or Corruption does occur in a MenEngage Global Alliance- donor supported projects, taking timely and appropriate action to address the problem.

3. Handling Cases of Fraud, Corruption and Non-Compliance

The types of actions to be taken against the member or partners who have been convicted of fraud or corruption or non-compliance to the code of conduct of the Alliance, will be identified following a rigorous and prompt investigation on the case by the MenEngage Global Alliance in collaboration with the co-chairs and members of the Governance Committee of the Alliance. Once the investigation committee or the governance committee of the Alliance makes a decision of sanctions against one or more members or partners, based on the mutually agreed MoU¹, this will be governed as follows:

I. Delays in the implementation of agreed upon activities/services.

- a. If there is a (possible) delay in project implementation of less than 3 months, except the case of sensitivities in a given context, the member and/or partner organizations will notify MenEngage Global Alliance earliest, explaining the reasons for and the consequences of the potential delay (also to be included in the Quarterly Progress Report).
- b. If there is a (possible) delay in project implementation between 3 and 12 months (the length of the standard MoU), the member/partner organization will also notify the Global Secretariat earliest, explaining the reasons for and the consequences of the

¹ The specific services to be provided by a partner organization are described in detail in the Memorandum of Understanding and documents that form in integral part of these agreements (project document, work plan and budget). In case the aforementioned parties are dissatisfied with the performance of MenEngage Global Alliance under these agreements, a complaint can be filed (see Complaints Policy and Procedure) with the Global Director and/or Co-Chairs of the Alliance.

(potential) delay. In such a case the Alliance and members/partners will jointly determine whether the postponed activities can be implemented within the contract period and how it will affect implementation of subsequent activities.

II. Non-implementation of activities and services

- a. If programmed activities are not implemented as agreed in the MoU, MenEngage Global Alliance will adjust the approved annual project budget accordingly and in collaboration with the respective steering committee members at the country or regional level, where applicable.
- b. If planned activities are not implemented as agreed, MenEngage Global Alliance may decide in cooperation with the Steering Committee of the country or regional network to terminate the MoU jointly.

III. Handling Fraud

The person first confronted with the case of (suspected) fraud shall report this immediately to the Global Director and/or Co-Chairs of the MenEngage Global Alliance. The same procedure described in the internal Fraud Prevention Policy of the Alliance is applicable, with the following exceptions/ additions:

- a) Payments to the staff member/s, consultant and/ or suppliers will be stopped immediately.
- b) Should an advance payment be on the way, the Global Coordinator or relevant contact of MenEngage Global Alliance will seek to retrieve the sum in question, where possible, with the aid of the principal banker and outsourced accountant.
- c) MenEngage Global Alliance Global Director will notify the relevant staff member and suppliers in writing that payments have been suspended and that:
 - The execution of the entire agreement will be suspended, giving a detailed explanation, and
 - MenEngage Global Alliance expects total clarification before resumption of the payments can be considered.
- d) After receiving a report and recommendations from the internal investigative committee, the Global Director, in cooperation with the co-chairs, will decide on whether the relationship with the staff, consultant or member/partner organisation should be terminated or, after improvement measures have been taken, can still be continued.
- e) Conditions set by MenEngage Global Alliance for continuation of the relationship might entail that:
 - The full extent of the damage is determined by MenEngage Global Alliance or a third party
 - The incidents are reported to the local authorities;
 - The member and/or partner organisation demonstrably improves organisation and monitoring;
 - Parties involved in the fraud will be suspended or fired.