



IFRC Secretariat Policy on the Prevention and Response to Fraud and Corruption

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1. Introduction, Commitments, Purpose, Scope and Audience

1.1 Introduction

The IFRC, in Strategy 2030¹, recognises that trust is essential to all its relationships. It enables its access to communities and to partnerships, as well as encouraging a productive and healthy staff and volunteer base. We fully embrace a culture of ethical practice and place personal and institutional accountability at the heart of all our work.

Fraud and corruption deprive the most vulnerable people, the victims of all disasters and other crises, of essential resources to deliver assistance and save lives. It is one of the most serious trust violations.

The IFRC shall endeavour to prevent, detect and respond to any form of fraud and corruption, and shall take appropriate measures within its means, while safeguarding the security and safety of its personnel.

1.2 Commitments and Guiding Principles

The IFRC takes a zero-tolerance approach to any form of fraud and corruption (the “zero tolerance” principle). This means that the Organisation will consider all reports of prohibited conduct and, where misconduct has occurred, hold perpetrators accountable for their actions.

The IFRC seeks to foster a work culture where everyone feels secure and empowered to report concerns of prohibited conduct. This means that the IFRC prohibits retaliation against those who speak up against violations of its standards of conduct, including those specified in this Policy.

The IFRC also ensures that care and support is always made available to people reporting concerns and those affected, including survivors and Whistleblowers.

1.3 Purpose

The purpose of this Policy is to:

- Define clearly what constitutes prohibited conduct in relation to fraud and corruption for the IFRC;
- Outline the obligations of IFRC personnel, including the responsibility of managers, to prevent fraud and corruption;
- Provide information on available resources to those who have witnessed any form of fraud or corruption;
- Set formal resolution mechanisms available to IFRC personnel as well as the appropriate channels for formal reporting of alleged breaches of this Policy; and
- Establish the IFRC’s duties in handling and responding to reports of alleged breaches of this Policy.

1.4 Scope of Application and Audience

This Policy applies to all individuals serving the IFRC irrespective of the duration or type of their contractual arrangement. This includes all IFRC Staff, Seconded Staff, and other persons working for or collaborating with the IFRC, including volunteers, interns, consultants and others based on agreed coordination modalities (such as integration and surge), even if contracted through a National Society (collectively “IFRC Personnel”).

IFRC includes a standard clause in its relevant agreements with third parties, including implementing partners, National Societies, service providers, contractors or subcontractors, and their respective personnel, on their duty to ensure a work environment that is free from fraud and corruption. Any third party may report allegations of prohibited conduct allegedly perpetrated by IFRC Personnel or involving IFRC-funded projects or programmes in accordance with the terms of this Policy.

¹ Strategy 2030, Transformation 3: Ensuring trust and accountability, 2019.

This Policy is effective as of the authorisation date and supersedes the Fraud and Corruption Prevention and Control Policy (2012). This Policy will be reviewed approximately every three years.

2. Definitions of Prohibited Conduct

2.1 Prohibited Conduct

For the purposes of this Policy, all types of fraud and corruption are collectively referred to as “prohibited conduct”. The Annex to this Policy provides a non-exhaustive list of behaviours that may constitute prohibited conduct.

2.2 Fraud

“Fraud” means any wilful act or omission intended to: a) deceive and to obtain an undue material benefit or moral advantage; or b) to escape moral, contractual or legal obligations, for himself, herself, itself or a third party, or c) to cause another to act to their detriment.

Fraud may result in the IFRC suffering a loss and/or the perpetrator achieving a private gain for themselves or others but does not necessarily imply financial gain.

2.3 Collusion

“Collusion” means any secret agreement or tacit cooperation between two or more individuals or entities (which may include IFRC personnel) aimed at defrauding or gaining an unfair advantage over a third party, in this case the IFRC.

2.4 Corruption

“Corruption” means any act or omission that misuses official authority or seeks to influence or secure the misuse of authority in order to obtain an undue benefit for oneself or a third party, including but not limited to the use of offers, promises, donations, gifts or any advantages as an inducement to or reward for receipt of such undue benefit.

Corruption may result in the IFRC suffering a loss and/or the perpetrator achieving a private gain for themselves or others but does not necessarily imply financial gain.

Corruption may exist in the absence of an immediate transaction and can be deferred (i.e., the gift, donation or advantage can be redeemed years after the undue benefit).

2.5 Extortion

“Extortion” means using or abusing one’s authority, either directly or indirectly, to demand unmerited cooperation or compensation through coercion. Extortion is a form of corruption.

2.6 Conflict of Interest

“Conflict of interest” means any situation in which a person who is in a position of trust (such as IFRC personnel) has a competing duty or interest which may impair or be incompatible with their responsibilities or ability to perform their position objectively. This may involve competing individual, familial, or professional interests.

A conflict of interest can be potential, perceived, or real, and exists even if no unethical or improper act results.

2.7 Nepotism, Cronyism, and Favoritism

“Nepotism” means using or abusing one’s authority to award advantages to relatives. Nepotism includes, among other things, employing or favouring the employment of, inviting applications for and/or awarding contracts to:

- i. partners/spouses, parents, children, sisters and brothers;
- ii. grandparents, grandchildren and the children of any brothers and sisters; and/or
- iii. parents, children and brother and sisters of partners/spouses.

“Cronyism” or “Favouritism” means using or abusing one’s authority to favour friends, colleagues and associates, or groups of people, because of private or professional affiliations or connections. It usually involves the distribution of resources or allocation of employment positions, or contracts, regardless of their objective qualifications.

Nepotism, cronyism or favouritism are forms of conflict of interest.

3. Responsibilities

3.1 The Governing Board

The Governing Board is collectively responsible for setting the tone, being an example and promoting a culture in which fraud and corruption are not tolerated. The Governing Board is guided in its actions by the “zero tolerance” principle.

The Governing Board is collectively responsible for protecting the integrity of the National Societies in accordance with the IFRC statutory texts and the IFRC.

Each member of the Governing Board shall be familiar with and follow the IFRC “*Policy on Protection of Integrity of National Societies and Organs of the International Federation*”² to ensure they can consider integrity issues relating to fraud and corruption when advising the IFRC President and/or the General Assembly.

3.2 The Audit and Risk Commission

The Audit and Risk Commission is responsible for overseeing the application of this Policy by the Secretary General, including the implementation of adequate preventative and detection measures, as well as any corrective actions.

The Audit and Risk Commission shall review the annual management report from the Office of Internal Audit and Investigations (OIAI) on the application of this Policy, summarizing the allegations received, the investigations undertaken, the resolution of cases and, based on these, take appropriate actions as needed.

If the Secretary General, the OIAI Director, or any OIAI section heads are the alleged SoC, the Audit and Risk Commission shall receive, assess and, if warranted, investigate the matter.

On the basis of the fact-finding report and any other information, the Chair of the Audit and Risk Commission shall determine, in consultation with the independent legal advice and any other relevant specialist, whether or not there are grounds for charging the OIAI Director, any OIAI section heads or the Secretary General with misconduct. The Chair of the Audit and Risk Commission may decide to convoke a disciplinary panel to assist in the provision of this recommendation.

3.3 The Secretary General

The Secretary General is responsible for setting the tone, being an example and promoting a culture in which fraud and corruption are not tolerated.

The Secretary General is responsible for the implementation and application of this Policy, including the implementation of adequate preventative and detection measures, as well as any corrective actions.

The Secretary General shall, in addition:

- Ensure operational independence of the OIAI so that it may determine its own work priorities and how it performs its mandated functions.
- Require IFRC delegations, offices, divisions, departments and functions to produce specific plans of action to prevent and detect prohibited conduct and periodically review implementation of the action plans and steps taken.

² https://www.ifrc.org/sites/default/files/Integrity_policy_2019_Final-1.pdf

- Require, if appropriate, a review of relevant policies, procedures and internal controls in the area where prohibited conducts have occurred to assess whether these need to be revised and what, if any, necessary corrective measures need to be undertaken.
- Receive and review audit and investigative reports from OIAI to take appropriate actions or review the implementation of action plans.

The Secretary General, or designee, shall review the recommendations stemming from preliminary assessments, initiate administrative investigations as appropriate, and may take any appropriate interim measures to protect the interests of the IFRC, or any person involved pursuant to the “do no harm” principle.

3.4 Global Management Team

The Global Management Team (GMT) is collectively responsible for setting the tone, being an example and promoting a culture in which fraud and corruption are not tolerated. They are guided in their actions by the “zero tolerance” principle.

All members of GMT shall:

- Demonstrate their commitment to providing a safe and respectful work environment by maintaining a high standard of personal conduct and remaining conscious of the power they hold by virtue of their position in the Organisation.
- Actively support and communicate the importance and benefit of a work environment free from any form of fraud and corruption.
- Hold all managers who report to them accountable for compliance with IFRC’s standards of conduct, including as set out in this Policy, and indicate areas of concern and needed improvement in the annual performance appraisal.
- Monitor staff wellbeing and take action to address any concerns, including ensuring that IFRC Personnel are aware of the available resources.

GMT members are responsible for the detection and prevention of fraud, corruption and other irregularities that could be committed by IFRC Personnel or third parties. They shall be familiar with the types of improprieties or prohibited conduct that might occur within their area of responsibility and be alert for any indication of irregularity.

GMT members shall implement reasonable measures and controls to prevent and detect fraud, corruption, and adequately mitigate those risks within their area of responsibility.

Any failure by a GMT member to inform or any effort to unreasonably delay, withhold a referral to, or discourage people to report allegations of prohibited conduct as defined in this Policy, is considered a breach of IFRC Code of Conduct and punishable by disciplinary measures that may include dismissal.

3.5 The Office of Internal Audit and Investigations

The Office of Internal Audit and Investigations (OIAI) functions independently from IFRC Management. The OIAI shall also be free from improper influence and fear of retaliation.

The OIAI receives, reviews, and investigates, where warranted, reports and allegations of prohibited conduct under this Policy.

The OIAI shall:

- Maintain, operate and administer the formal reporting mechanism established to receive reports or allegations of prohibited conduct.
- Inform, without unreasonable delay and not later than five working days after receiving the allegations, the Secretary General, of any serious or material allegations of prohibited conduct.
- Evaluate, or assess, allegations to determine credibility, materiality, and verifiability, and, if appropriate, predicate an administrative investigation.

- Conduct investigation expeditiously within the constraints of available resources and engage external parties or experts to assist in investigations as needed.
- Consult and collaborate with the Human Resources Management and Legal Departments in respect of reports of alleged prohibited conduct.
- Consult and collaborate with the Communications Department to prepare reactive lines and/or reply to media inquiries regarding alleged or substantiated misconduct.
- Consult and collaborate with the Partnerships Department to prepare notifications and reports to partners and donors with respect to alleged or substantiated misconduct.
- Make internal control improvement recommendations, as appropriate, to the IFRC Management, that are derived from its investigative findings.
- Consult and collaborate as appropriate with National Societies, the ICRC, and any other organisations, international institutions, or other relevant parties to exchange ideas, practical experience, and insight on issues of mutual concern and prohibited conduct as defined by this Policy.
- Aid and share information with other Investigative Offices, or other organisations with which the OIAI has bilateral agreements, within the OIAI's discretion, in adherence to IFRC policies and procedures.
- Enter into agreements to facilitate collaboration with other agencies and with relevant international and regional organisations with a view towards promoting and strengthening the measures referred to in this Policy and participate in international programmes and projects aimed at the prevention and detection of fraud and corruption.
- Consider and audit fraud and corruptions risk as part of the Annual Assurance Plan.
- The Head of Internal Audit will periodically audit, where appropriate, the application of this Policy, and make recommendations for the revision or improvements this Policy. To ensure independence, this audit will be outsourced and managed without the oversight of the Director of OIAI.
- The OIAI shall prepare an annual management report on the application of this Policy, summarizing the allegations received, the investigations undertaken, and the resolution of cases.

3.6 Risk Management

As defined by the IFRC's Risk Management Policy, the IFRC is committed to the management of risk as an integral part of its strategy formulation and implementation. This included the management and mitigation of risk relating to fraud and corruption. At all levels across the IFRC management of fraud and corruption risks shall be considered and integrated into the organisations planning and operational process.

As per the IFRC's Risk Management Policy (which should be read in conjunction with this Policy) business units should follow the following steps to identify and mitigate fraud risk, which should be captured in the unit's respective risk registers:

- Identify fraud and corruptions risks that could impact IFRC's objectives.
- Assess the impact and likelihood of identified fraud and corruption risks.
- Develop suitable fraud and corruption risk treatment and responses.
- Where needed, escalate fraud and corruption risks to senior management.
- Continually monitor, reassess and report fraud and corruption risks as needed.

3.7 IFRC Personnel

As defined under paragraph 1.4 of this Policy, all IFRC Personnel regardless of location of service, position or contract type, shall:

- Familiarise themselves and comply with IFRC's standards of conduct, including those set out in this Policy.
- Actively remind colleagues of appropriate conduct and model acceptable behaviour in the workplace and/or with respect to colleagues outside of the workplace.

- Participate in IFRC mandatory trainings on fraud and corruption and ensure they are aware of the channels for reporting prohibited conduct in order to be able to guide colleagues on available resources to navigate challenging situations.
- Immediately report any suspicions or concerns of prohibited conduct as defined in this Policy, using the reporting procedure described in paragraph 5.1 below. This includes no attempt to personally conduct investigations or interviews related to any suspected prohibited conduct.
- Act in good faith in reporting prohibited conduct and participating in any subsequent administrative process, i.e., have reasonable grounds for assessing the information provided as credible. Any report or information provided that is known to be false or malicious, or with a reckless disregard for the truth of the statements made, may be subject to separate disciplinary action.
- Cooperate with the investigators and be truthful in their response to the investigators.
- Ensure confidentiality of any allegations of fraud and corruption and investigative process, i.e., not share nor discuss any information related to allegations of fraud or corruption with IFRC colleagues or External Parties, including with the IFRC Membership, and refer any request for information as per the contents of paragraph 5.1 below.

3.8 Managers

In addition to their responsibilities noted above for all IFRC Personnel, Managers shall:

- Demonstrate their commitment to providing a safe and respectful work environment, free of fraud and corruption, by maintaining a high standard of personal conduct; reminding team members of their obligation to demonstrate appropriate behaviour in the workplace; encouraging open and transparent exchanges; and holding colleagues accountable for contributing to a transparent work environment.
- Make themselves available to those who wish to raise concerns of prohibited conduct by others in confidence and handle those concerns promptly and effectively. Managers should recognise the seriousness of any allegations raised, regardless of their own perception of the allegations, and report promptly to OIAI.
- Participate in IFRC mandatory training for Managers on fraud and corruption and ensure they are aware of, and they actively communicate to team members the channels for reporting prohibited conduct.
- Take measures to support team members known to them to have been involved in any administrative procedures pursuant to this Policy, including through measures to ensure the Whistleblowers or witnesses feel safe and to restore a harmonious work environment in their teams.
- Continuously seek to build their capacities, skills, and competencies in managing diverse teams, in contexts where fraud and corruption may be prevalent.

3.9 The Human Resources Management Department (HRMD)

HRMD as well as Human Resources functions in the Delegations work to prevent and resolve workplace issues, including in respect of any prohibited conduct, acting as a support and adviser to IFRC Personnel and Management.

The HRMD shall:

- Provide information, advice, and guidance to those experiencing or witnessing prohibited conduct in connection with their work for IFRC.
- Inform in writing the individual alleged to have committed a misconduct, when they are IFRC Personnel, pursuant to staff regulations, local staff regulations, or local law, as appropriate.
- Determine, based on the investigation report, in consultation with the Legal Department and any other relevant department, whether or not there are grounds for charging an IFRC Personnel with misconduct, pursuant to staff regulations, local staff regulations, or local law, as appropriate.

- Notify in writing the individual alleged to have committed a misconduct of the charges against them, including a description of the nature of the alleged misconduct, the facts found upon which HRMD based its determination, and the disciplinary measure(s) that might be taken against them. Recommend appropriate disciplinary measures based on the evidence, including the fact-finding investigation and any written response submitted by the IFRC Personnel. Convoke, where appropriate, a disciplinary panel to assist in the provision of this recommendation.
- Inform in writing the individual alleged to have committed a misconduct of the determination and the disciplinary measures, taking into account the nature and severity of the misconduct and any mitigating circumstances, and ensure timely implementation of any measure or sanction.
- Oversee appropriate administrative and disciplinary action in accordance with the IFRC Staff Regulations, local staff regulations, or local law, as appropriate, where misconduct has been formally alleged or found to have occurred. This includes working with line managers to ensure the maintenance or restoration of a harmonious working environment for all concerned.
- Maintain adequate records of the disciplinary process, including the charge letter, any written statements received from the SoC, as well the record of disciplinary measures issued, if any, and other relevant documents.
- Maintain, update and communicate a list of contact with qualified psychosocial counsellors available to all IFRC Personnel affected by the alleged prohibited conduct or participating in an administrative investigation.
- In addition, advise IFRC staff on their health and safety in connection with work and may make referrals to medical and psychosocial support professionals.

3.10 The Legal Department

The General Counsel and Legal Department shall:

- Provide legal advice to the Secretary General, senior management, the OIAI and the HRMD on prevention and risk mitigation within the Organisation, including but not limited to staff training and other implementing tools.
- Provide legal advice to governance on integrity cases.
- Provide legal advice to ensure that credible allegations of fraud and corruption are fully investigated and that investigation procedures and any subsequent disciplinary actions are fair, equitable, lawful and in accordance with the IFRC's internal rules, policies and procedures.
- Ensure that this Policy is incorporated as necessary in the contractual instruments of the IFRC with implementing partners, National Societies, service providers, contractors and subcontractors (and their personnel).
- Provide legal advice on reporting obligations to donors and partners in accordance with the IFRC's contractual obligations.
- Oversee the referrals of any cases involving fraud or corruption to local police or prosecutors as appropriate and with the consent of the Secretary General.

3.11 The Insurance Unit

The Insurance Unit shall:

- Advise on and obtain adequate insurance coverage on fraud (e.g., Crime Master or Fidelity Insurance Policy).
- File any related claims upon the agreement of the Insurance Management Committee, and report on progress of any claims filed.

3.12 The Ombudsperson

The Ombudsperson provides confidential, impartial and informal advice, support and guidance on any work-related matter.

The Ombudsperson does not disclose the content of any confidential conversations without the visitor's prior permission (unless the situation is one involving an imminent risk of serious harm to the visitor, others, or IFRC premises).

3.13 The Staff Association

Members of the Staff Association are available to IFRC staff members for advice and guidance on all matters concerning working conditions, including providing informal and confidential advice on matters covered under this Policy.

The Staff Association will not share identifying details when escalating any issue raised without the reporting person informed consent and it will maintain confidentiality.

3.14 External Audit

The IFRC recognises that the primary responsibility for the prevention and detection of fraud and corruption rests with those charged with governance and management.

The external auditors shall obtain reasonable assurances that the financial statements, taken as a whole, are free from material misstatements, whether caused by fraud or other irregularity. The external auditors shall also identify potential opportunities for fraud or corruption, make appropriate enquiries on any actual, suspected or alleged fraud or corruption affecting the IFRC, and implement any such procedure in compliance with ISA 240.

If the external auditor has identified fraud or has obtained information that indicates that fraud may have occurred or is occurring, the external auditor shall communicate these matters on a timely basis to the OIAI, or use one of the reporting channels defined in paragraph 5.1.

4. Prevention of Fraud and Corruption

4.1 The Secretary General

The Secretary General establishes or promotes the following effective practices aimed at the prevention of fraud and corruption:

- A Code of Conduct that defines and describes those behaviours forbidden because they may qualify as acts of fraud or corruption.
- An ombudsperson, ethics or mediation office having for a mandate to advise, in confidence, personnel on ethical dilemmas.
- A fraud and corruption risk management program, including comprehensive fraud and corruption risk assessments, fraud and corruption control activities, communication process to obtain information about potential fraud, coordinated approaches to investigation, and ongoing evaluation of the program.³
- A policy or procedure allowing partners, donors and the public to obtain, where appropriate, information on the IFRC, its functioning and decision-making processes of its administration and, with due regard for the protection of privacy and personal data, on decisions that concern members of the public.
- Ensure that OIAI publish an annual report summarizing the allegations received, the investigations undertaken, and the resolution of cases.

4.2 Procurement

The IFRC takes the necessary steps to establish appropriate systems of procurement, based on transparency, competition and objective criteria in decision-making, that are effective, inter alia, in preventing fraud and corruption.

All the procuring entities and the procurement functions in the IFRC shall implement adequate controls, considering appropriate threshold values in their application, to address, inter alia:

³ Anti-fraud playbook, ACFE, Grant Thornton (2020).

- The public distribution of information relating to procurement procedures and contracts, including information on invitations to tender and relevant or pertinent information on the award of contracts, allowing potential tenderers sufficient time to prepare and submit their tenders.
- The background checks and due diligence of partners, suppliers and intermediaries, or any party having business relationships with the IFRC.
- The establishment of conditions for participation, including selection and award criteria and tendering rules, and their publication.
- The use of objective and predetermined criteria for procurement decisions, in order to facilitate the subsequent verification of the correct application of the procurement rules or procedures.
- An effective system of review, including an effective system of appeal, to ensure administrative recourse and remedies in the event that the procurement rules or procedures are not followed.
- The declaration of conflict of interest by personnel responsible for, or involved in procurement, screening procedures and training requirements.

4.3 Finance and Administration Department

The IFRC takes appropriate measures to promote transparency and accountability, preserve the integrity of accounting books, records, financial statements or other documents related to expenditure and revenue and to prevent the falsification of such documents.

The Finance and Administration Department implements adequate measures to:

- Adopt realistic budgets, that are open and transparent, with due regard to IFRC strategy and policy;
- Implement budgets in an orderly and predictable manner, and demonstrate control and stewardship in the use of IFRC funds.
- Produce and maintain adequate records and information that are disseminated to for the purposes of ensuring decision-making controls, adequate management of resources and effective reporting.
- Ensure transparency on major sources of income and expenditures, ensure that the spending departments receive reliable information on availability of funds.
- Ensure timely and frequent reconciliation of data from different sources (e.g., partners, suppliers, and banks).
- Ensure the timely delivery of consolidated year-end financial statements which are critical for transparency in the financial management system.
- Ensure all financial records and supporting documentation are retained for an agreed number of years, with timetables for the destruction of main ledgers and supporting records and guarantee the retention and destruction policy is disseminated and enforced.
- Ensure that the consolidated year-end financial statements are externally audited, and external audit recommendations are timely implemented.

4.4 HRMD

The IFRC adopts, maintains and strengthens systems for the recruitment, hiring, retention, promotion and retirement of personnel and, where appropriate, other elected officials, based on transparency, competition and objective criteria in decision-making, such as merit, equity and aptitude.

The HRMD shall implement adequate measures to:

- Appropriately screen anyone in a position of trust or with material access to the IFRC resources and assets.
- Promote adequate remuneration and equitable pay scales, taking into account the level of economic development of the country in which personnel are to be posted.
- Promote education and training programmes to empower employees and officials to manage fraud and corruption risks and proper performance of their functions.

- Provide all personnel with specialised and appropriate training to enhance their awareness of the risks of fraud and corruption inherent in the performance of their functions.
- Adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.

4.5 Surge Team

The IFRC adopts, maintains and strengthens systems for the selection, deployment and management of surge personnel, based on transparency, competition and objective criteria in decision-making, such as merit, equity and aptitude.

The Surge Team shall implement adequate measures to:

- Appropriately screen anyone in a position of trust or with material access to the IFRC resources and assets.
- Promote adequate remuneration and equitable pay scales, taking into account the level of economic development of the country in which personnel are to be deployed.
- Promote education and training programmes to empower surge personnel to manage fraud and corruption risks and proper performance of their functions.
- Provide all personnel with specialised and appropriate training to enhance their awareness of the risks of fraud and corruption inherent in the performance of their functions.
- Adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.

5. Reporting Prohibited Conduct

5.1 Reporting Channels

Anyone who believes they have witnessed or know of conduct prohibited under this Policy is encouraged to document and report any incidents, providing as much information as possible.

Reports can be made confidentially or even anonymously, although anonymous reporting may impair the IFRC's ability to follow up on the information provided in certain circumstances where insufficient details are provided.

IFRC Personnel have an affirmative duty to report a possible breach of this Policy in line with the Staff Regulations.

Reports shall be made to the IFRC's Integrity Line, an independent channel that accepts reports on an identifiable or anonymous basis. Reports of prohibited conduct under this Policy, made through this channel, are received directly by qualified personnel at the OIAI. Integrity Line can be contacted in the following ways:

- Online at <https://ifrc.integrityline.org/>;
- Via telephone at +41 800 IFRCRC (+41 800 437272); or
- By email at speakup@ifrc.integrityline.org.

If a manager or human resources personnel become aware of allegations, they shall file a report on Integrity Line, under the Section "Fraud and Corruption", without undue delay, and in all cases no later than 5 days after learning about the allegations.

The IFRC recognises that reporting can be difficult, and it can take time to feel comfortable raising a concern. There is no time limit for filing a report and all reports will be given due consideration. However, individuals who are in a position to report allegations are encouraged to do so in a timely manner to the extent possible as the passage of time is likely to affect the ability to look into the matter and, where warranted, take appropriate action.

The IFRC will not investigate prohibited conduct under this Policy or events that occurred or are alleged to have occurred more than eight years before the report, as the material evidence, such as accounting records or communications, are disposed or destroyed after eight years.

5.2 Information to the reporter

The OIAI shall acknowledge receipt of the report in a timely manner, no later than 7 days, and may request additional information prior to, or in connection with, the initial review procedure, known as a Preliminary Assessment.

The reporting individual shall be informed by the OIAI of the status of the investigation, without being given specific details on the investigative activity undertaken, as follows:

- The admissibility of the report within three months upon its reception;
- The final report within three months upon a fact-finding investigation being launched;
- Any extension (s) of the time frame for the investigation when authorized by the Secretary General; and
- The resolution of the investigation within three months following the issuance of the report.

5.3 Confidentiality

All reports received by OIAI, line managers, and/or HRMD, shall be treated with discretion and confidentiality and appropriate measures will be taken to prevent the unauthorized disclosure of information. This includes maintaining confidentiality around the identity of the person reporting misconduct, any persons affected by the prohibited conduct or alleged to have committed the prohibited conduct.

Anyone involved in receiving and handling reports of alleged breaches of this Policy has a duty to maintain strict confidentiality of the process. Information reported or uncovered through the investigation process will therefore only be shared on a legitimate need-to-know basis.

IFRC Personnel have a duty to keep any information provided to OIAI, or others involved in an administrative investigation, confidential and to not disclose the existence of the investigation or their participation in such investigation. Any breaches of confidentiality by IFRC Personnel may constitute grounds for disciplinary action and may have an adverse impact on any ongoing investigation of the prohibited conduct.

All inquiries concerning allegations of prohibited conduct or an ongoing investigation of prohibited conduct, including from subjects of investigations, their legal counsel, reporters or witnesses, partners, donors, the media or any other person shall be directed to the Director, OIAI or the IFRC's General Counsel.

No information concerning the status of an investigation will be given out by IFRC Personnel unless authorized by the Director, OIAI, or the General Counsel. The proper response to any inquiries is: "I am not at liberty to discuss this matter."

5.4 Whistleblower Protection and Support

All persons who report allegations of prohibited conduct under this Policy in good faith, and any person who assists or provides information in the course of an investigation, will be protected against retaliation in accordance with the IFRC's Whistleblower Protection Policy.

The IFRC will treat retaliation as a separate act of misconduct, independently of the determination on the reported matter or allegations.

6. Response and Handling of Reports of Alleged Prohibited Conduct

6.1 The Preliminary Assessment

Once a report has been registered, it will be evaluated by the OIAI to determine its credibility, materiality, verifiability and whether the OIAI has a mandate to intervene:

- Credibility: whether it is reasonably possible that the incident(s) occurred.
- Verifiability: whether sufficient evidence can be obtained related to the allegations.
- Materiality: whether the allegation(s), if substantiated by evidence, would constitute a serious breach of IFRC's internal rules, policies and procedures. A "serious breach" is a misconduct that, if confirmed, would result in a sanction more severe than a letter of warning.
- Mandate: whether the conduct falls within the scope of application of this Policy.

The report will be examined to determine whether there is a legitimate concern of possible misconduct that might, if confirmed, constitute a breach of the IFRC's internal rules, policies and procedures which would warrant an investigation.

In the event the conclusion of the Preliminary Assessment is that the matter does not raise a legitimate concern of possible prohibited conduct, the reporter will be so informed, and the matter will be dismissed.

In the event the conclusion of the Preliminary Assessment is that there is a legitimate concern of possible prohibited conduct, the Secretary General will be informed and an investigation will be initiated (see paragraph 6.3 below).

In the event that the Preliminary Assessment identifies a performance issue or interpersonal conflict, the matter will be handled pursuant to Staff Regulation 9.4.2.c), or equivalent, as appropriate.

6.2 Investigation

The purpose of an investigation is to gather and examine all relevant evidence and to determine the veracity of the allegations.

All investigations conducted by the OIAI are considered as being administrative, rather than criminal in nature. Findings are based on facts and related analysis, which may include drawing reasonable conclusions based upon these.

The OIAI shall maintain objectivity, impartiality, and fairness throughout the investigative process and conduct its activities competently and with the highest levels of integrity. The staff of the OIAI, or anyone invited to serve as an investigator, whether internal or external, shall disclose to the Director, OIAI, in a timely fashion any actual, perceived, or potential conflicts of interest they may have in an investigation in which they are participating, and the Director, OIAI shall take appropriate action to remedy the conflict.

The investigation shall be conducted in a timely, impartial, thorough, and fair manner. The investigation shall respect the rights of all parties. The OIAI shall, wherever possible, seek corroboration of the information in its possession. The OIAI shall examine both inculpatory and exculpatory information with a view towards establishing a factual record of the events in question.

Investigative Activity and critical decisions should be documented in writing and reviewed with managers of the OIAI. "Investigative Activity" is any activity that includes the collection and analysis of documentary, video, audio, photographic, and electronic information or other material, voluntary interviews of witnesses, observations of investigators, and such other investigative techniques as are required to conduct the investigation. The OIAI shall maintain and keep secure an adequate record of such Investigative Activity.

To the extent possible, and during the investigation phase, interviews conducted by the OIAI should be carried out by two persons. Interviews of SoC, Reporters or Whistleblowers will always be conducted by two investigators. For interviews of witnesses and other persons, the number of interviewers depends on the nature and the circumstances of the case.

Interviews may be conducted in a language the interviewee feels comfortable in, or where appropriate using interpreters.

The OIAI will never pay a witness or a SoC for information. Subject to the Organisation's rules, policies and procedures, OIAI may cover reasonable expenses incurred by witnesses or other sources of information in order to meet with investigators, provided it is previously agreed upon.

The Reporter and the SoC may be accompanied to interviews with the investigator(s) by a colleague or member of the Staff Association, who shall act in an observer capacity.

All parties are free to seek legal advice at any stage of an investigation, but such counsel must be sought independently of IFRC. As the investigative process is an internal administrative matter, however, no party may be accompanied or represented by legal counsel during the investigative process.

6.3 Interim Measures

The Secretary General or other designated decision-maker pursuant to local staff regulations may take interim measures, including but not limited to suspension of the SoC until completion of the investigation, reassignment of the SoC to a temporary project or the changing reporting lines, and/or take appropriate interim measures to support the Reporter, with their consent.

As warranted by the needs of the investigation or the interests of the IFRC or any affected party, the OIAI, or other designated decision-maker pursuant to staff regulations, local staff regulations, or local law, as appropriate, may decide, among others, to:

- Remove physical documentation, computers, hard disks and/or any electronic data storage media from its current location and secure it in another location;
- Limit access to the location where the documentation, computers, hard disks and any electronic data storage media currently exists; and
- Prevent the SoC from having access to documentation, computers, hard disks and any electronic data storage media pending the conclusion of the investigation.

6.4 Support

The IFRC has a duty to provide support to any person(s) involved in an administrative investigation.

The OIAI will provide a list of psychosocial counsellors to all persons interviewed and counsellors may be contacted directly by the individual for confidential support. Staff Health may also assist in arranging contact with psychosocial counsellors.

In addition, the Director, OIAI, may decide, with the consent of the individual(s) concerned, to refer anyone involved in an administrative investigation to Staff Health for an initial assessment and determination as to whether psychosocial counselling is advisable.

6.5 Information and Reporting

The Reporter will be provided with general feedback on the progress of the investigation, including on the expected timeframe for its completion, and be informed of the outcome of the investigation process in respect of any element(s) that relate specifically to them, including whether the allegations were substantiated and, if so, whether the matter has been referred for a disciplinary process.

The SoC shall be notified in writing that an investigation is being initiated and the nature of the allegations as soon as practical, having in mind the needs of the investigation, and in all cases prior to being interviewed. The Subject will also have an opportunity to respond to all allegations and to present supporting evidence and information, including suggesting the names of persons to be interviewed. The

SoC will also be informed of the status of the investigation, including as to the expected timeframe for its completion.

IFRC partners or donors shall be timely notified, in writing, of any credible allegations of prohibited conduct under this Policy as appropriate and/or as contractually agreed upon. This notification shall ensure strict confidentiality of the identity of all parties involved, including the SoC at least until the merits of the allegations have been established and only to the partners or donors that can justify a legitimate need to know this information.

If the OIAI does not find sufficient information during the investigation to substantiate the allegation(s), it will document such findings, close the investigation, and notify the relevant parties and any partners or donors as appropriate.

If the OIAI finds sufficient information to substantiate the allegation(s), it will document its investigative findings and refer the findings to the relevant authorities within the IFRC, consistent with the IFRC's internal rules, policies and procedures, for appropriate action and sanction, and notify the relevant parties and any partners or donors as appropriate.

6.6 Disciplinary and Appeals Process

In the event the investigation establishes that prohibited conduct has occurred, appropriate action, including but not necessarily limited to disciplinary action, will be taken in accordance with the provisions of Chapter IX of the IFRC Staff Regulations, local staff regulations or domestic law, as applicable.

IFRC staff members who consider that the investigative and/or disciplinary processes were not handled pursuant to the applicable procedures may have recourse to the appeals process in accordance with Chapter XII of the Staff Regulations, local staff regulations or domestic law, as applicable.

In the event the person found to have committed prohibited conduct is not an IFRC staff member or is not otherwise regulated under the IFRC's Staff Regulations, the matter will be handled in accordance at the IFRC's discretion in accordance with any contractually agreed terms with the employer of such person or in accordance with domestic law.

In the event the investigation establishes that prohibited conduct has occurred, and the person found to have committed prohibited conduct or co-conspirator is a supplier, service provider or anyone employed by them, appropriate action will be taken by the IFRC to prevent the party from receiving funds or contracts financed by the IFRC (i.e., debarment).

The OIAI will consider, in consultation with Legal Department, whether it is appropriate to refer information relating to the alleged prohibited conduct to the appropriate national authorities and shall seek the necessary internal authorisation to do so in cases where a referral is deemed to be warranted.

The IFRC may seek to recover any losses resulting from prohibited conduct using all means at its disposal, including civil or criminal legal action. In case of fraudulent or corrupt practices by cooperating partners, contractors or suppliers, appropriate recovery measures will be taken in accordance with this Policy and any relevant contractual arrangements.

7. Abbreviations/acronyms

Abbreviation	Meaning
ARC	Audit and Risk Commission
CII	Conference of International Investigators
HRMD	Human Resources Management Department
IFRC	International Federation of Red Cross and Red Crescent Societies
OIAI	Office of Internal Audit and Investigations
SG	Secretary General (IFRC)
SoC	Subject of Concern

8. Related documents

Name	Version
Staff Rules	2019
Strategy 2030	2019
Staff Code of Conduct	2007
Whistleblower Protection Policy	2015
Investigation Charter	DRAFT
Investigation Procedure	DRAFT
ISA240-The auditor's responsibilities relating to fraud in an audit of financial statements	2009
Uniform Principles and Guidelines for Investigations (CII)	2009

9. Document revision history

Version	Date	Details
1.0	2012	New release
2.0	30/10/2023	Policy Revision

Appendix 1: Examples of Prohibited Conduct

The examples below are not exhaustive and are meant to be used for guidance on what behaviours may constitute prohibited conduct.

Examples of Fraud

- Theft of cash on hand
- Theft of cash receipts
- Skimming incoming payment before the payment is recorded
- Cash larceny, or theft of incoming payment after recording
- Embezzlement
- Theft of supplies and equipment
- Billing schemes: shell company, non-accomplice vendors, personal purchases
- Payroll schemes: Ghost employees, falsified wages or records
- Employment fraud: mischaracterise, falsify or forge education, employment or experience records to obtain a position, promotion, employment reward or any employment benefit
- Misrepresent currency exchange rates to embezzle funds or personally profit from exchange rate variations
- Expense reimbursement schemes: mischaracterised expenses, overstated expenses, fictitious expenses, and multiple reimbursements
- Check tampering: forged makers, forged endorsement, altered payee, authorised maker
- Register disbursements: false voids, false refunds, false entries on a cash register to conceal the fraudulent removal of cash
- Misuse of inventory and other assets (non-cash)
- Inventory and other assets theft or larceny
- Diversion of aid or inventory during transport
- Unauthorised private use of the IFRC vehicles
- Diversion or theft of fuel or theft of fuel
- Inflated or distorted needs to embezzle funds or divert aid
- Financial statement fraud, intentional misstatement, overstatement, understatement or omission of material information in the financial reports, or improper disclosures

Examples of Corruption

- Bribery
- Invoice kickbacks
- Illegal gratuities
- Gifts in kind
- Bid rigging schemes: manipulated specifications, insider information, biased prequalification
- Disclose confidential information to obtain an unfair advantage or benefit for oneself or a third party
- Manipulated selection of local and/or implementing partners
- Manipulation or diversion of humanitarian assistance to benefit non-target groups
- Surplus procurement in exchange of bribes or gratuities
- Accepting substandard goods or services in exchange of bribes or gratuities
- Payment for access to aid
- Payment to access public services, or expedite request (see also facilitation payments)
- Corrupt exclusion or inclusion of beneficiaries
- Post-distribution taxing or expropriation
- Economic extortion, intimidation and coercion
- Sex extortion, allocation of relief resources in exchange for sexual favours⁴
- Facilitation payments

⁴ Refer also to SEA Policy

Examples of Conflict of Interest

- Participating in the recruitment, appointment or promotion of a family member, friend or associate to any position with the IFRC, whether paid or not
- Participating in the supplier qualification, supplier selection or any contract award paid, or prospectively paid, with IFRC funds to a family member, friend or associate
- Preferential treatment for family members, friends or associates
- Taking any interest, shareholding, or accepting any position, in an organisation or company that engaged, engages or will engage in business or transactions with the IFRC