

Anti-Bribery Policy

[Updated Nov 2012]

1. Principles

- 1.1. War Child is committed to maintaining the highest ethical standards and will not tolerate the payment or receipt of bribes by its staff, volunteers, local partner organisations or any other person acting on War Child's behalf in any country.
- 1.2. War Child defines bribery as 'the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities'.
- 1.3. Examples of bribery include a potential supplier offering money or a gift in order to influence a tender process; or a government official asking for payment in order to secure NGO registration. However, these examples are not exhaustive
- 1.4. Any involvement in bribery would severely damage War Child's reputation and undermine the trust and support of beneficiaries, partners, the wider public and donors.

2. Persons and overseas jurisdictions

- 2.1. This policy applies to any person acting on behalf of War Child, in any country.
- 2.2. "Any person" refers to any employee, volunteer or other person acting on behalf of War Child or one of War Child's local partner organisations.
- 2.3. "Any country" refers to any country whether War Child is currently operational there or not – it is not exclusive only to territories where War Child has a headquarters or international implementing office.

3. Coercion – payments under duress

- 3.1. Primacy of life is central to War Child's Security Policies, particularly in recognition in the often insecure environments in which we operate.
- 3.2. Therefore any payment made under severe duress in order to preserve life, limb or liberty of a person acting on behalf of War Child is not considered to be a bribe, but instead is straight-forward theft by the threatening party.
- 3.3. Persons coerced into making such payments will not be subject to the ramifications of misconduct as set out in section 7.

4. Policies and procedures

- 4.1. War Child's existing organisational policies and procedures exist to promote a strong control environment, including a zero-tolerance approach to bribery.
- 4.2. Existing procedures to mitigate against the risk of bribery include:
 - 4.2.1. Stringent procurement procedures – expenditure disallowed without production of genuine receipts, proof of purchase and delivery of goods or services, dual authorisations and multiple supplier quotations.

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- 4.2.2. Limit on value of cash purchases in most country locations above which cheque or bank transfer must be used for payment.
 - 4.2.3. Internal audit checks on purchasing paperwork during head office country visits.
 - 4.2.4. Reference checks for all potential new employees and trustees prior to final appointment.
 - 4.2.5. Criminal records/police checks for all new employees, trustees and volunteers.
 - 4.2.6. Partner Assessments carried out on local partner organisations prior to formalising any working relationship between them and War Child. These should be repeated on an annual basis, with regular progress-checks and capacity building by sufficiently qualified War Child employees.
 - 4.2.7. Message of zero tolerance promoted throughout the organisation on a regular basis, in staff meetings, reference in all Trustee meetings and country visits from head office.
- 4.3. All employees, trustees and volunteers of War Child, local partner organisations and agents regularly acting on behalf of War Child, should confirm their commitment to this Anti-Bribery policy through completion of the **Statement of Commitment to War Child's Anti-Bribery Policy (Annex A)**.

5. Gifts or hospitality

- 5.1. Persons acting on behalf of War Child may accept gifts or hospitality under the following conditions only:
- 5.1.1. when the value of the gift or hospitality is so low such that it is not material to either War Child or the person acting on behalf of War Child; and either
 - 5.1.2. refusal to accept would give offence; or
 - 5.1.3. accepting simple hospitality would improve War Child's acceptance by the community.
- 5.2. Persons acting on behalf of War Child may give gifts or hospitality only with permission from the Chief Executive Officer, Finance Director, Programmes Director, Fundraising Director or Country Director, and if the gift or hospitality is of low value to all parties concerned and considered appropriate to cultivating a particular relationship.
- 5.3. Records must be kept of all gifts and hospitality that are received or given.

6. Reporting

- 6.1. Any member of staff, volunteer or other person acting on behalf of War Child who is offered or asked for a bribe must report this to the Finance Director or Chief Executive Officer (in the UK) or to the War Child Country Director (overseas) who should report such instances to the Finance Director (in the UK).
- 6.2. If a member of staff has reason to believe that a colleague or other person acting on behalf of War Child has paid or been in receipt of a bribe they must report this immediately to the Country Director, who will in turn report to the Programmes Director. In the event that the Country Director is the subject of the allegation, staff should report directly to the Programmes Director, Finance Director or Chief Executive Officer.
- 6.3. The identity of any member of staff who makes such an allegation will be held in the strictest confidence and War Child will investigate all cases with sensitivity and rigour.

- 6.4. Country security plans should identify whether the local context or War Child's activities – including not only programming, but also significant procurement processes or transactions – invite the risk of bribery and detail further procedures for staff to follow if asked for or offered a bribe, under duress or otherwise.
- 6.5. All allegations of offers, receipts or giving of bribes to or by any person acting on behalf of War Child should be registered by the Finance Director who should report such instances to the Board of Trustees. The trustees are responsible for ensuring that immediate action has been taken to protect the assets of War Child and to investigate the source of the allegations.
- 6.6. The trustees are also responsible for reporting any such allegations to the Charity Commission for England and Wales under the guidelines for Serious Incident Reporting.

7. Ramifications of misconduct

- 7.1. Any alleged giving or receiving of bribes by a person acting on behalf of War Child will lead to the suspension of the relationship between that person and War Child with immediate effect whilst investigations are being carried out. If that person is a War Child employee, he or she will be suspended on full pay.
- 7.2. Investigations will be carried out by a panel which should include at least one of the Chief Executive Officer, Finance Director, Programmes Director, Fundraising Director or Country Director and two other people chosen by them on the basis of their experience or position.
- 7.3. The investigation process will be confidential and information limited only to those who need to know. All parties involved will be required to keep all information relating to the case confidential and documentation will be filed securely.
- 7.4. If any individual associated with War Child is found to have violated the organisation's Anti-Bribery Policy or committed criminal acts, immediate disciplinary action will take place. This may include:
 - 7.4.1. Employees – disciplinary action or dismissal (International staff will be repatriated to their country of origin and police reports may be filed)
 - 7.4.2. Volunteers, trustees, interns – ending the relationship with War Child
 - 7.4.3. Local partner organisations – withdrawal of funding/support and ending the relationship with War Child
 - 7.4.4. Consultants/contractors/agents – termination of contract
 - 7.4.5. Criminal prosecution
- 7.5. Adverse determination from an investigation should be open to challenge through an appeals process which will follow the right to appeal procedure contained within War Child's Grievance and Disciplinary Policy.
- 7.6. All parties concerned will be notified of War Child processes and the outcome of the investigation in a timely manner.
- 7.7. The media will be dealt with by the Fundraising Director, guided in their response at all times by the Chief Executive Officer.



**STATEMENT OF COMMITMENT
to War Child's Anti-Bribery Policy**

I _____ have read and understood the standards and guidelines outlined in this Anti-Bribery Policy. I agree with the principles, standards and guidelines contained therein and accept the importance of implementing anti-bribery policies and the adherence to zero-tolerance to bribery.

Name _____

Acting for War Child as _____

*Employee / Volunteer / Intern / Trustee / Local partner organisation / Other
(please state, including job title in all cases)*

Location _____

Signature _____

Date _____

This form should be completed by all persons acting on behalf of War Child and kept with employment or other contractual records.