



WOSSO POLICY STATEMENT: ANTI-CORRUPTION, FRAUD & BRIBERY

1 Introduction

Women of the South Speak Out (WOSSO) is made of a consortium of organisations, who will work to ensure the voices of women and girls from the global south, in all their diversity, inform the decisions and policies that affect our lives. WOSSO will support and facilitate women's rights organisations and women leaders, to ensure their meaningful engagement in key advocacy meetings and share evidence. WOSSO is led by Gender Links, working with ARROW and MannionDaniels.

Each consortium organisation is a legal entity and bound by its own organisational policies¹, practices, and country laws within which they operate. The purpose of this policy statement is therefore to:

- set out agreed common standards.
- provide information and guidance on how to recognise and report bribery, fraud and corruption issues.
- set out a common process for investigating issues.

¹ WOSSO consortium organisational policies include:
ARROW Anti-Corruption Policy
Gender Links Finance Policies and Procedures 2022-2023
MannionDaniels Anti-Corruption, Fraud and Bribery Policy Anti-Corruption-Fraud-and-Bribery-Policy-2.pdf (manniondaniels.com)

WOSSO is a consortium between



Funded by



This policy statement is relevant for all those working on the WOSSO team - so all associated parties including WOSSO team comprising of Gender Links, Arrow and MannionDaniels staff, consultants, members of the WOSSO Independent Advisory Committee and other WOSSO volunteers, consultants, suppliers and authorised representatives. This policy statement also applies to WOSSO Fellows and beneficiaries whilst they are working for and/or representing WOSSO.

2 Definitions

Whilst there are no universally accepted definitions, WOSSO defines the following:

Corruption is the abuse of entrusted power for private gain

A **bribe** is as an inducement or reward offered, promised or provided to gain and commercial, contractual, regulatory or personal advantage.

Fraud is economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully.

Embezzlement is the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian.

Kick back is a form of bribery, where someone involved in a purchasing process (procurement) gets a reward or commission, material or non-material from the supplier for placing an order of goods or services.

Extortion is the act of obtaining goods, services, loyalty, allegiance, favours by force, threats or undue demands.

Favouritism is the unfair promoting of one person or a group at the expense of others.

Nepotism is favouritism shown to relatives in conferring offices or privileges.

Conflict of interest is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in one's role is, or could be, impaired or influenced by a secondary interest.

Gifts are defined as, but not limited to, services, travel, entertainment, material things or favours. In order to respect local traditions and conventional hospitality minor gifts are accepted. The value of an acceptable gift varies in different countries. Cash gifts are never accepted. A gift should never influence independent judgment.

3 WOSSO's principles for all associated parties

All WOSSO associated parties commit to behaving professionally and ethically, and within the law, at all times when working for and/or representing WOSSO.

By working with WOSSO, the following principles must be met:

- Do not give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Do not accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return.
- Do not favour friends, family or other personal relations in recruitment, procurement, aid delivery or other situations.
- Declare a conflict of interest that impacts your ability to apply judgement or act in your role.
- Do not abuse your position for your own gain.
- Comply with relevant WOSSO consortium organisational financial policies and procedures.

Annex 1 lists potential risk scenarios for illustrative purposes only.

4 Reporting Concerns

As well as behaving professionally and with integrity, it is **each individual's responsibility to recognise and report concerns.**

All WOSSO associated parties anywhere in the world, are expected to report any

concerns of fraud, bribery, and corruption, and to cooperate with any investigation of such concerns. You do not need to be certain of the occurrence of bribery, fraud, or corruption to raise your concerns. You can do this by contacting:

Location	Name	Surname	Designation	E Mail
Overall	Colleen	Lowe-Morna	Special Advisor, Gender Links	specialadvisor@genderlinks.org.za
Africa	Thulani	Mkhosana	Head of Finance and Operations, Gender Links	finGLSH@genderlinks.org.za
Asia	Emily	Yip	Operations Director, ARROW	emily@arrow.org.my
MENA	Rolla	Khadduri	Head of Gender & Social Development Practice, MannionDaniels	rolla.khadduri@mansiondaniels.com

If you prefer to report a concern and or allegation of fraud anonymously, then you can set up an anonymous email account and report the incident, either by emailing: glintegrity@genderlinks.org.za; or by reporting the case without including your name on the whistleblowing link:

<https://survey.alchemer.com/s3/7545158/GL-Complaints-Form>

In both cases, please put the reference WOSSO.

5 WOSSO responsibilities

As WOSSO management, we have the responsibility to **disseminate this policy statement widely** so that all associated parties understand our approach to anti-corruption, fraud and bribery. We will do this by publishing this policy online, and by ensuring awareness-raising/training for all associated parties on a regular basis (time

period to be determined by nature of association with WOSSO).

As WOSSO management, we also have the responsibility of **carrying out due diligence** on our grantees and suppliers, both initially and then on a regular basis for the duration of the grant through regular monitoring.

As WOSSO management, we also have the responsibility **to take all concerns and allegations seriously**, to respond to them appropriately with a thorough and fair investigation, to record all details and report where necessary, and to learn from the instances to prevent.

Specifically, our responsibilities at WOSSO are:

- We will respond to notification of any concerns and/or allegations of corruption, fraud or bribery immediately (within 24 hours).

- Information will be immediately reported directly to the FCDO programme team managing or on to FCDO's Counter Fraud Section.
- We will carry out a thorough and fair investigation, based on best practice and hearing points of view of all concerned (this will be prioritised and done giving it the thoroughness and time it deserves, whilst making sure that all people within the investigation are safe).
- We cannot commit to anonymity due to legal implications and the need to keep parties safe, but we can commit to confidentiality from those not directly involved in the investigation.
- We will take expert, neutral advice where needed.
- We will record and report on all cases to WOSSO Leadership, and report relevant details to donors as contractually obliged and depending on the severity of the allegation.
- We will inform all parties involved of the outcomes of the investigation.

WOSSO is responsible for **conducting a robust investigation**. This includes:

- Gathering sufficient information when an allegation is made.
- Appointing a trained investigation team.
- Formulating the allegations based on the breach of the Code of Conduct/ organisations policies.
- Being clear about people's role.
- Adhering to these principles of investigation
- Conduct fair evidence-gathering as much as possible.
- Analyse the evidence to make the findings.

- Holding a learning review on how the investigation went.
- Managing the expectation of people involved.
- Recording and reporting the investigation details if necessary.

6 Processes and procedures

Investigations can result in HR repercussions, such as a formal warning, suspension or expulsion from the WOSSO project. If the concerned party is a grantee or beneficiary or stakeholder, investigations are preferably run in conjunction with the concerned party's organisation who should take responsibility for their actions. Thus investigations can also result in information being shared with other associated party organisations. **The WOSSO Leadership, and where necessary independent expert advice, will have final decision on the repercussions of an investigation for WOSSO team members.**

Cases of corruption can end in dismissal and notification to the police, or other types of sanctions, if it becomes clear that the law has been violated.

Investigations will feed into the **WOSSO risk register**. The risk register is reviewed regularly at Leadership team meetings which occur monthly, and is used to reflect on vulnerabilities and mitigation of those to learn from incidents and to notify outside authorities (such as FCDO) where needed. This policy statement will be reviewed, approved and endorsed by the WOSSO Leadership annually.

Annex 1 - Potential Risk Scenarios

The following is a list of possible scenarios that may arise during the course of the WOSSO programme and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

1. You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
2. You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
3. A third party insists on receiving a commission or fee payment before committing to sign up to a contract with the Employer, or carrying out a government function or process for us.
4. A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
5. A third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
6. A third party requests an unexpected additional fee or commission to "facilitate" a service.
7. A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
8. A third-party requests that a payment is made to "overlook" potential legal violations.
9. A third-party requests that you provide employment or some other advantage to a friend or relative.
10. You receive an invoice from a third party that appears to be non-standard or customised.
11. A third party insists on the use of side letters or refuses to put terms agreed in writing.
12. You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
13. A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to you.
14. You are offered an unusually generous gift or offered lavish hospitality by a third party.