



ANTI-BRIBERY AND CORRUPTION POLICY

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1. Introduction

The board and staff members of AJESH are committed to a zero-tolerance policy on bribery and corruption in any form, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.

AJESH, as a Cameroon registered organisation, is aware of its obligations to The National Anti-corruption Commission (CONAC) created by Decree No. 2006/088 created in 2007 and this policy is intended to ensure that it is fully able to respect these.

2. Oversight

The Board is responsible for overseeing the policy and bribery and corruption risks or incidents are a standing item on Board meeting agendas, to be dealt with at each Board meeting.

The management team is responsible for ensuring that the policy is put into practice and regularly reviewed and, if necessary, updated, and for keeping the risk register and register of interests up to date.

3. Definitions

AJESH understands corruption as an abuse of power and/or position for advantage. We recognise its serious negative effects on individuals and society as a whole and as such, are committed to combating it.

A bribe is understood by AJESH 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. This includes offers or gifts of favours for friends and family as well as for the individual and includes "facilitation fees".

4. Risk Assessment

Incidents of bribery and corruption include, among others, the following:

- Official processes, such as obtaining a visa, permit or registration document. Officials may request a "facilitation fee" or other informal payment. In particular, customs and immigration: officials may demand extra payments to allow a person to travel
- Relationships with clients. Examples may include:
 - Requests by clients to participate in or lead on proposals in return for favours
 - Requests by clients to intercede with third parties in return for favours
 - Requests by clients to ignore evidence of bribery or corrupt practice in their work
- Consultants and service delivery. Examples may include:
 - Requests for special consideration in choosing a consultant/service delivery provider
 - Offers of favours for accepting inflated prices or other unfavourable contract options

- In all the above cases, AJESH staff members may face conflicts of interest: AJESH's conflict of interest policy is attached here as Annex A and all staff members should adhere to it.

Possible risks in relation to such incidents include:

General context: AJESH works in Cameroon where corruption is demonstrated at certain levels: from the police officer accepting a cash payment from drivers that they stop in the street, through customs and other government officials who insist on extra payments in order to process the paperwork that is part of their job, to senior civil servants and ministers who have wealth that surpasses by far their official incomes. In this context, it is not possible for people connected with AJESH not to encounter incidents in which they receive demands for bribes or other favours.

Target group: AJESH's targeted groups are Community people, Rural and urban poor, Youth, Women, Men and The Elderly / Aged .They may frequently be small, new and vulnerable to pressure. With AJESH staff body made up of experts who may As a result of implementing activities, may be faced with considerable risks of receiving or offering bribes or other corrupt practices. This is a threat to the targeted population and the people who work with them and directly to AJESH, which has a responsibility to prevent bribery.

AJESH's own procedures: In addition to its relationships with the communities, areas in which AJESH could be vulnerable include recruitment, procurement, transactions with the authorities and the development of work in a new region or country where we are less familiar with the context. These are addressed in existing policies, but attention must be paid in risk reviews that the procedures are up to date, appropriate and put in practice.

Consequences for AJESH: The organisation could be subject to prosecution under the law if it does not ensure that it acts against corruption. There could also be serious impacts on AJESH's reputation if it is perceived as accepting, condoning or turning a blind eye to corruption.

5. Procedures

AJESH has the following instruments in place to reduce the risk of corruption occurring:

5.1 Protection of staff members against corruption risks

- Ensuring that all staff members are fully informed about the anti-bribery and corruption policy and procedures as well as the conflict of interest policy and are able to put them into practice
- Providing regular learning sessions to support staff in responding to corruption incidents and developing appropriate strategies to deal with particular situations as they arise
- Ensuring that all staff members, when on AJESH business, have papers and permissions in order and carry a document stating AJESH's zero tolerance policy, attached here in Annex B
- Ensuring that all community members and donors are fully informed about AJESH's zero tolerance of corruption

5.2 Due diligence

AJESH undertakes to carry out a bribery and corruption risk assessment when it enters a contracting relationship with another entity and a due diligence assessment against that risk, including verifying whether the entity has and puts into practice its own anti-bribery policies. This will be repeated at periodic intervals. AJESH's own zero tolerance policy, (Annex B), will be incorporated into Memoranda of Understanding with donors or collaborating partners.

5.3 Dealing with corruption incidents

The procedures in dealing with incidents of corruption are as follows:

5.3.1 *If a staff member encounters a direct or implicit request for a bribe or favour or an offer of a bribe or favour:*

- 1. Say "no":** In *all cases*, **except if a person's health or security are at risk**, the response to any attempt at bribery or corruption should be to refuse and to reiterate AJESH's policy of zero tolerance.
- 2. Internal report:** Any bribery incident needs to be reported internally. Incidents should be reported to your line manager and, if it is serious, to the team as a whole. (Serious incidents are those in which the person attempting corruption does not accept the "no" immediately, when someone's health or security is put at risk, or when attempts to corrupt occur more than once by the same individual or institution). All incidents should be recorded on the relevant page in the risk register.
- 3. Investigation:**
Any serious case of corruption should be investigated. This applies when a staff member has been at risk and so has had to comply with a demand or when a staff member has managed to resist a demand but has suffered delay, disruption, abuse or inconvenience as a result. It also applies when one or more staff members report incidents with the same individual or institution, i.e. when it appears that there is a pattern of corrupt practice occurring.

The investigation should involve the line manager and at least one other member of the AJESH team, who will interview the person or people concerned within a maximum of two weeks of the incident being reported and support them to analyse the incident. The team produces a short written report that is then immediately shared with the Board. The report must include analysis of how and why the incident occurred and make recommendations as to how procedures can be strengthened so that a staff member is not put in that situation again. The investigation interview should also include a check on the staff member's welfare and identification of their support needs around any trauma or distress resulting from the incident.

If the investigation team has the impression that the staff member was willingly complicit with the corruption incident, then the procedures outlined in 6.3 below will apply.

4. Inform others

Information about incidents in which a staff member has been threatened or at risk or when there appears to be an institutionalised pattern of corruption should be shared with other actors: donors, partners and other collaborating organisations and individuals. As much information as is compatible with the continued safety of the staff member and of other parties affected by but not complicit in the corruption that might be at risk should be divulged so that others can also take action in response.

Whenever it is possible without endangering staff members or clients, AJESH should also report the incident to the relevant authorities in order to enter the incident on the official record and to stimulate action against corruption. AJESH recognises that this is not always possible: the authorities can sometimes be complicit in the corruption themselves.

5.3.2. If a staff member identifies corrupt practice on the part of a donor or collaborating partner or other party with whom AJESH is associated

This may include evidence or suspicion of a range of issues that could include, among others, financial mismanagement, trafficking influence, bribery and nepotism. If a staff member has identified such practice in a donor or collaborating partner or other organisation, they should immediately report it to the administration and the rest of the team. AJESH should then investigate the reported incident, with a view to confirming whether corruption has taken place and if so, what the circumstances were.

If the investigating team identify that corruption has taken place, they should write a short report of the incident and record it on the risk register.

Following identification of an incident, AJESH must take action. The exact response will depend on the particular circumstances and the severity of the case, but it could include:

- Confronting them directly with the incident and, if they acknowledge it, discussing with them how to avoid such incidents in the future. (This is only appropriate for one-off incidents in exceptional circumstances).
- If it is an individual, reporting them to their line manager or senior management in their organisation
- Supporting the organisation to come up with appropriate procedures and responses to prevent such an incident happening again
- Ending collaboration or support agreements with the organisation concerned
- In the most serious cases, reporting the incident to the authorities or relevant institutions. Context must be borne in mind when exploring this option: it could expose the person, organisation and people associated with them to extremely serious consequences.
- In the most serious cases, reporting the incident to other organisations or individuals that work with the individual/organisation, to warn them of the risks.
- If the incident includes the complicity of an international organisation AJESH should also report it to the Fraud Office but with exception if to do so would expose someone to serious threats to their health or security. If the latter is the case,

AJESH should ensure that it has documented the incident and has explored all possible avenues to report and tackle the incident.

5.3.3 If a staff member identifies corrupt practices on the part of a colleague

This may include evidence or suspicion of a range of issues that could include, among others, financial mismanagement, trafficking influence, bribery and nepotism. If a staff member has identified such practice in a colleague, they should immediately report it in confidence to administration or to a Board member. AJESH should then immediately investigate the reported incident, with a view to confirming whether corruption has taken place and if so, what the circumstances were.

If the investigating team identify that corruption has taken place, immediate action must follow, using the disciplinary procedure outlined in AJESH's Terms and Conditions of Employment. The consequences for the staff member, depending on the severity of the incident and the circumstances, could range from suspension to dismissal to criminal prosecution. Records of the incident and the responses will be kept in AJESH's confidential personnel records.

If the incident concerns senior management or the board, the staff member may also choose to report it to an external body such as the bribery and corruption office.

6. Dissemination and communication

AJESH's zero tolerance statement is incorporated into contracts, memoranda of understanding and other contractual arrangements.

AJESH will make its own anti-bribery and corruption policy available on its website, in English and in French.

AJESH will support its partners to look at their own anti-corruption and bribery practice and to develop their own appropriate responses to incidents of bribery and corruption.

7. Monitoring and evaluation

All reported incidents are included in the risk register document.

The risk register and corruption incidents are a standing item on team meeting agendas.

The Board reviews the risk register at each meeting and reviews responses when relevant.

Once a year, the management team reviews all corruption incidents that occurred during the year and reports on these to the Board and the team. If patterns emerge that demonstrate that risks need to be re-evaluated, this is done so.

8. Collective action

AJESH commits to sharing information on bribery and corruption with other organisations with a view to combating it wherever it occurs.

ANNEX A: Conflict of Interest Policy

This policy applies to:

- All staff
- Consultants, volunteers and interns
- External advisers

A- What is a conflict of interest?

A conflict of interest is any situation in which the personal interests of an individual or the loyalty which they owe to another organization or person, could influence, or appear to influence, a decision they make in relation to AJESH's strategy, contracts or program.

AJESH recognizes that it is inevitable that conflicts of interest will occur. The issue is not the integrity of the individual concerned, but the management of any potential to profit from a person's position in the organization or being unduly influenced by conflicting loyalties.

B- Why have a policy

Conflict of interest may create problems, they can:

- inhibit free discussion;
- result in decisions or actions that are not in the interests of AJESH or its partners; and
- risk the impression that AJESH has acted improperly.

The purpose of this policy is thus to protect AJESH, its staff and representatives, and ultimately its clients, from impropriety and any appearance of impropriety.

C- Declaration of interest

Staff members, interns, volunteers and consultants should declare their interests in connection with their role in AJESH. A declaration of interests form is provided for this purpose, listing the types of interest that should be declared. This should be updated at least annually and also when any changes occur.

D- Decision making/managing contracts/applying for funding

Any staff member, intern, volunteer or consultant who has a financial interest in a matter under discussion, should declare the nature of their interest and withdraw from the

discussion and final decision, unless they have a dispensation to speak from other members of the team.

If a staff member, intern, volunteer or consultant has any interest in the matter under discussion, which creates a real danger of bias, that is, the interest affects them, or a member of their family or household more than the generality affected by the decision, they should declare the nature of the interest and withdraw from the discussion and final decision, unless they have a dispensation to speak.

If a staff member, intern, volunteer or consultant has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest, but may participate in the discussion and decision making.

If in any doubt about the application of these rules they should consult with their colleagues. Such declarations and the actions taken will be recorded in the notes of the meeting. The report will record:

- The nature and extent of the conflict of interest;
- An outline of the discussion;
- The actions taken to manage the conflict of interest.

E- Gifts and hospitality

Whilst it is recognised that receiving a working lunch/dinner or attending a reception in your capacity as staff member or representative of AJESH is unlikely to be perceived as having an actual or potential influence on the conduct or behaviour of the person concerned, it is important that receipt of more substantial gifts or acts of hospitality are viewed as a benefit and should be declared and recorded.

Staff members, volunteers, interns and consultants are, therefore, advised to register any gifts or individual hospitality that they receive with a value of 50.000 (Fifty thousands) fCFA, or which can be perceived as being significant. This should be done by informing colleagues in writing. Substantial gifts will be entered on the Register of Interests. Monetary gifts should never be accepted: the only money that AJESH staff can receive is their own salaries or per diems issued by AJESH or any fund directly transferred to account for a project.

ANNEX B: AJESH's zero tolerance statement

AJESH has a zero tolerance policy on bribery and corruption in any form, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.

Staff members are forbidden to offer, promise, give or accept money, gifts or other advantages as an inducement to do something that is illegal or a breach of trust in the course of carrying out AJESH's activities. This includes offers or gifts for friends and family as well as for the staff member.

Staff members are also expected to report any incident in which they are encouraged to do the above.