



# **ANTI-CORRUPTION POLICY**

**December 2018**

## **A. CORE PRINCIPLES**

### **1.0. Zero Tolerance for Corruption:**

WAAPA's Anti-Corruption Policy is based upon a zero tolerance approach to corruption. Zero tolerance means that WAAPA does not tolerate corruption in relation to any of its work and that all suspicions of corruption thought to be in breach of this policy are reported to WAAPA Board Chair. It means that WAAPA will take all suspicions of corruption seriously and assess, act upon, investigate and discipline all such cases as appropriate and in a professional, transparent and fair manner. Compliance with this policy is mandatory for Board members, staff, implementing partners, consultants and related Third Parties. Failure to do so will result in a disciplinary action including the possibility of termination of employment or termination of the violating party's contract and/or working relationship with WAAPA. WAAPA furthermore reserves the right, without prejudice to any other right or remedy available to it, to take such additional action, civil and/or criminal, as may be appropriate.

### **2.0. Upholding WAAPA's Values and Integrity:**

Corruption, in contrast, poses a direct threat to WAAPA's values and its ability to work according to a rights-based approach, humanitarian principles and its commitment to do no harm. It has profound adverse effects on social, economic and political development, disproportionately harms the poor and vulnerable. Corruption distorts the proper and effective conduct of WAAPA's work. Any direct or indirect involvement in corruption poses a serious threat to WAAPA's integrity and credibility, and could severely harm its members, collaborators and development partners. Preventing corruption is therefore not only a priority for WAAPA, but a necessity dictated by its mandate and a requirement for all staff, consultants, members and collaborators. At WAAPA, we believe in conducting our work ethically, honestly, and in full compliance with all laws and regulations applicable to the respective contexts in which we work. Our commitment to doing our work the right way is a crucial part of what makes us WAAPA. We follow a rights-based and participatory approach to our work grounded in the principles of humanity, neutrality, impartiality and independence.

### **3.0. Safeguarding WAAPA's Entrusted Means:**

WAAPA works with entrusted means in the form of funds, logistics, vital confidential information, documents and other resources entrusted to the organisation by public, private donors and development partners for proper, efficient and effective use in its national, regional and international operations. WAAPA has an obligation towards these development partners to ensure that these means and WAAPA's activities and operations are not subject to corruption. All staff, as well as all others working with WAAPA's assets, therefore have a responsibility to ensure that corruption is prevented in WAAPA activities.

#### **4.0. Corruption Risk:**

Corruption is extensive, institutionalised and even systemic in many of the environments in which WAAPA operates in West Africa. It poses a risk both internally in the organisation and externally in interactions with development partners, public officials, collaborators and others. WAAPA operates at national, regional and international environment where responsible governments often have little or inadequate capacity to tackle corruption. WAAPA thus strives to prevent any possibility that the assistance it provides might generate new corruption opportunities or reinforce existing ones. Not only this, but through its Anti-Corruption Policy and strict zero tolerance approach to corruption, WAAPA also aims to eliminate corruption from its work and to reduce overall levels of corruption in its areas of operation.

#### **5.0. Corruption Definition:**

WAAPA's definition of corruption includes all forms of fraud and constitutes serious misconduct in accordance with WAAPA's Constitution and Code of Conduct. WAAPA adopts the following definition for corruption: Corruption is the misuse of entrusted power and resources for private gain. This definition is not limited to interactions with public officials and covers both attempted and actual corruption, as well as monetary and non-monetary corruption. Examples of the forms corruption takes include, but are not limited to: facilitating payments, bribery, gifts constituting an undue influence, kickbacks, favouritism, cronyism, nepotism, extortion, embezzlement, misuse and disclosure of confidential information without approval, theft, and various forms of fraud, such as forgery or falsification of documents, and financial or procurement fraud.

### **B. POLICY STATEMENTS**

#### **6.0. Internal Anti-Corruption Culture and Practices:**

- 6.1. WAAPA has a zero tolerance for corruption in all its forms. Staff members, alliance members and consultants are prohibited from engaging in corrupt activities, both in their work and in their private life. Failure to comply will result in a disciplinary action including the possibility of termination of employment and prosecution.
- 6.2. WAAPA's Staff, alliance members and consultants are committed to staying accountable and transparent, to upholding WAAPA's values and integrity, to following formal procedures, and to safeguarding WAAPA's entrusted means.
- 6.3. It is the obligation of everyone subject to this Anti-Corruption Policy to bring forward any related issues, questions, doubts or concerns to National Alliance Board Chair person's, WAAPA Head of Secretariat and WAAPA Board Chair person, based on the origin.

- 6.4. The reporting mechanism includes the submission of the questions, doubts or concerns of complain through any of the available communications medium directly to the appropriate officers. The writer could be anonymous or be visible.
- 6.5. WAAPA is committed to ensuring that everyone subject to this Anti-Corruption Policy understands: a) the consequences of violating the policy as it applies to them; b) their duty to report all suspicions of corruption thought to be in breach of this policy to WAAPA; and 3) how to do so via WAAPA's Constitution and Code of Conduct and the above Reporting Mechanism in item 6.4.
- 6.6. WAAPA is committed to using transparent, straightforward and clear procedures, monitoring, checks and balances and documentation in order to avoid corruption in our work.
- 6.7. WAAPA is committed to avoiding conflicts of interest.
- 6.8. WAAPA is committed to ensuring that any representation or hospitality promised, given or received is modest, occurs within a standard business framework and aligns with development partners regulations. Representation and hospitality must never compromise WAAPA's integrity, neutrality, policies and guidelines, or otherwise exert or attempt to exert an undue influence on any party.
- 6.9. Staff members are prohibited from promising, offering, giving, seeking or accepting personal gifts or other advantages representing more than token value to or from service providers, collaborators, development partners, authorities or other WAAPA stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any WAAPA staff or stakeholder are strictly prohibited. Staff involved in partner and beneficiary selection will exert enhanced caution in this regard. All cash gifts are strictly prohibited.
- 6.10. WAAPA strictly prohibits the promising, offering, giving, seeking or accepting of representation, hospitality and gifts for staff involved in the procurement process.
- 6.11. If it is not possible for a staff member, alliance member to reject a gift in a manner that does not compromise WAAPA's work or her/his health or safety, then the gift may be received but must be reported and handed over to the supervising officer to become the property of WAAPA and its member Alliance. Any such gifts must be used appropriately for the benefit of WAAPA and its members as an organisation, its projects and/or its beneficiaries.
- 6.12. WAAPA will protect staff members and alliance members from pressures to violate this policy and will ensure that unchecked discretion is never awarded to any member of staff and alliance members.

6.13. WAAPA holds the well-being, health and safety of its staff and members to be of paramount importance. In situations of duress when health and safety are in imminent danger, for example, staff and members should not endanger their lives or the lives of others due to strict adherence to WAAPA's Anti-Corruption Policy. WAAPA will strive to prevent staff and members from falling victim to such situations. Should they occur, however, then such incidents must be reported to National Alliance Board Chair, WAAPA Head of Secretariat or WAAPA Board Chair person as soon as it is safe and possible to do so.

## **7.0. External Stakeholders:**

7.1. WAAPA is committed to ensuring that its beneficiaries understand their rights and entitlements and how to report suspected corruption to WAAPA, as well as the standards and behaviour demanded of WAAPA staff and others subject to this Anti-Corruption Policy.

7.2. WAAPA is committed to preventing its beneficiaries from falling victim to corruption.

7.3. WAAPA is committed to excluding a person from receiving WAAPA benefits when it is determined that that person has only obtained access to such benefits through corrupt means and is otherwise not entitled to them.

7.4. WAAPA is committed to ensuring that its national alliance members, collaborators, consultants, development partners know, understand and comply with this Anti-Corruption Policy in terms of the standards and behaviour the policy demands of them, as well as the consequences of breaching it, up to and including the possibility of termination of the violating party's contract and/or business relationship with WAAPA.

7.5. WAAPA is committed to promoting awareness and use of its complaints and reporting mechanisms and to ensuring that all WAAPA stakeholders, have safe, easy and trusted access to report suspected corruption in confidence.

7.6. WAAPA will help relevant stakeholders to avoid corruption as an element of its aim to build and support the capacity of its staff and member alliances, development partners, collaborators and governments.

## **8.0. Reporting and Investigations:**

8.1. WAAPA is committed to taking all reported suspicions of corruption seriously and assessing, acting upon, investigating and disciplining all such cases as appropriate and according to professional, transparent and fair procedures.

8.2. WAAPA is committed to protecting reporting persons' confidentiality and rights, and does not tolerate retaliation against reporting persons.

8.3. WAAPA considers knowingly making a false report of corruption to constitute a violation of this policy. Doing so will result in a disciplinary action including the possibility of termination of employment, termination of term of office, termination of the violating party's contract and/or working relationship with WAAPA.

8.4. WAAPA will seek to recover any assets lost due to corruption.

8.5. WAAPA is committed to meeting its obligations to report instances of corruption to relevant development partners and to external authorities as appropriate.

## **9.0. Compliance and Corruption Risk Management:**

9.1. WAAPA is committed to knowing and understanding the Anti-Corruption legislations and regulations applicable to its operational jurisdictions and projects. WAAPA and its staff will comply with the legislations of the countries in which they are located as well as the rules and regulations of its development partner and applicable international Anti-Corruption treaties and conventions. When local legislations sets lower standards than the WAAPA Anti-Corruption Policy, Constitution, Code of Conduct or administrative procedures, then these internal procedures are to be used to the extent that they do not directly conflict with local legislations.

9.2. WAAPA will learn from corruption cases, take corrective action and adjust our culture and practices accordingly in order to better prevent future cases and ensure compliance.

9.3. WAAPA Board will review WAAPA's Anti-Corruption Policy regularly with respect to legal and regulatory developments in countries of operations and to ensure compliance and best practice.

9.4. WAAPA is committed to preventing corruption by systematically assessing and reviewing corruption risks in its work. WAAPA can thereby design its interventions and mitigating measures according to these risks, also as they may relate to external parties, such as alliance members, public authorities, collaborators and development partners.

## **10.0. Signature**



Board Chairman  
17<sup>th</sup> December 2018



Head of Secretariat  
17<sup>th</sup> December 2018