

Sudan Assist for Development Organization,

Khartoum 2020

Sudan

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Fraud and corruption policy 2020

Strategy 2020 voices the collective determination of the SADOto move

forward in tackling the major challenges that confront humanity

in the next decade. Informed by the needs and vulnerabilities of

the diverse communities with whom we work, as well as the basic

rights and freedoms to which all are entitled, this strategy seeks to

benefit all who look to SADO to help to bu ild a more

humane, dignified, and peaceful world.

Over the next ten years, the collective focus of the SADOwill be on

achieving the following strategic aims:

1. Save lives, protect livelihoods, and strengthen recovery from

disasters and crises

2. Enable healthy and safe living

3. Promote social inclusion and a culture

of non-violence and peace

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Approved By:

The Head of SADO organization ,

after consultation with the Finance Manager

Associated Policies and Documents:

SADOFinancial Regulations

SADOIntegrity Policy

SADORecruitment Procedures and Induction Program

SADOStaff Regulations and annexes

SADOCode of Conduct

SADODisciplinary Measures

SADOCash Transfer Regulation

Procurement Manual for the Procurement of Good and Services

Standards for Investigations for the Risk Management and Audit Department

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FRAUD AND CORRUPTION PREVENTION AND CONTROL POLICY

PREAMBLE

This Fraud and Corruption Prevention and Control Policy (the "Policy") outlines the SADO

s approach to the prevention and control of fraud and corruption, including the

investigation procedures that will be followed if there are suspicions of fraudulent or corrupt

practices. If fraud or corruption is proven, appropriate disciplinary measures and legal action will be

taken.

The assets of the Sudan Assist for Development Organization (SADO) (the

"SADO") are its staff, (including staff-on-loan and individuals working under the

SADO name and legal status, as well as its consultants, volunteers and interns

(collectively the "Personnel"), its reputation and the resources provided by donors.

The SADO is committed to high ethical standards, transparency and accountability

to all internal and external stakeholders including the SADO

(the "Members"), Personnel, beneficiaries, donors, cooperating partners, contractors or suppliers.

The Sudan Assist for Development Organization, in accordance with best risk management practice, acknowledges that

strong internal prevention mechanisms and controls at all managerial levels and locations in the

organisation, including headquarters and field, are the best methods for preventing fraud and

corruption. The differing risk environments in which the Sudan Assist for Development Organization operates must be

taken into consideration. In some environments the level of risk may be higher and thus require

more rigorous prevention mechanisms and controls than in other environments.

The Sudan Assist for Development Organization is preventing and dealing swiftly and appropriately with

fraud and corruption perpetrated by its Personnel and perpetrated against the International

Federation by cooperating partners, contractors or suppliers and any collusive practices among such

any parties.

The Sudan Assist for Development Organization recognises that fraud and corruption prevention and control is not a

separate function and needs to be incorporated into all aspects of the Sudan Assist for Development Organization’s

activities. Accordingly, the Sudan Assist for Development Organization will ensure that there are elements of fraud and

corruption prevention and control in all relevant policies, procedures and systems.

All Sudan Assist for Development Organization’s Members, Personnel, cooperating partners, contractors or suppliers

are responsible for fraud and corruption prevention and control will be made aware of this policy.

Adherence will be ensured as applicable.

SECTION 1. DEFINITION OF FRAUD AND CORRUPTION

Fraud and Corruption are defined as follows:

Fraud: Fraud is any intentional act or omission designed to deceive others, resulting in the victim

suffering a loss and/or the perpetrator achieving a gain.

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Corruption: Corruption is the abuse of entrusted power for private gain, including bribery.

Fraud and Corruption do not necessarily imply immediate financial benefits for the individual(s)

committing fraud or corruption, but may cause financial or reputational damages to the

Sudan Assist for Development Organization. States consider such offenses to be criminal and/or violations of civil law.

SECTION 2. ELEMENTS OF FRAUD AND CORRUPTION

In cases of fraud and corruption there are generally three elements which individually can be

addressed to prevent the act:

Perceived Opportunity: often a gap in controls, an opportunity that fraud or corruption can be

Perpetrated without the person committing the fraud and corruption being caught, exposed and/or

action taken against them.

Perceived Opportunity can be addressed by implementation of controls such as securing money in

Safe, performing reconciliations, having clear disciplinary measures that are enforced, obtaining

Proper authorization and the like.

Removing the perceived opportunity has been proven to be the most effective way to reduce fraud

and corruption.

Motive: the reason why the person is committing the act of fraud and/or corruption.

These could vary widely and can include financial pressures, financial problems, gambling

Problems, maintaining a lifestyle, vengeance against the organisation, emotional problems, and the

like.

Motive can be addressed through measures such as employee support programmes, open door

Policies, and treating and compensating employees fairly.

Rationalization: is the justification of the act of fraud or corruption.

Rationalization is not to be confused with the difference between right or wrong. In fact, the

perpetrator often knows that it is wrong, but will think the act justified for one reason or another.

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These can include thoughts that no one will really get hurt, that they are just getting what they are

owned, that everyone does it, that is for a good cause, or that money is just being “borrowed”.

Rationalization can be addressed through actions such as raising awareness of the Code of Conduct

and the negative impacts of fraud and corruption on the organisation and beneficiaries, Prevention

of fraud and corruption training, regular performance appraisals, and simply treating employees

fairly.

Through this policy the organisation seeks to ensure that it addresses all three of these elements in

its policies and procedures.

As further assistance in the identification and prevention of fraudulent or corrupt acts:

Appendix 1 provides a non exhaustive list of potential fraudulent and corrupt practices.

Appendix 2 provides a non exhaustive list of indicators which may flag the potential exposure to

fraudulent and corrupt practices.

Appendix 3 provides a selection of good management practices that may assist in limiting fraud

and corruption exposure.

SECTION 3. SCOPE OF POLICY

All cooperating partners, contractors and suppliers will be made aware of this Policy, its

applicability to be established in the relevant contracting instruments.

All Members will be made aware of this Document. If the Sudan Assist for Development Organization is informed of

potential fraudulent or corrupt practices involving a Member, the Sudan Assist for Development Organization will

ensure that the National Society is made aware of such allegations. Should such potential fraud or

corruption also implicate Sudan Assist for Development Organization Personnel or resources it is expected that the

Member will fully cooperate with any investigations commissioned by the Sudan Assist for Development Organization

in this regard. Otherwise in line with the Federation’s Integrity Policy, it is expected that Members

will take the necessary actions to handle any allegations concerning themselves.

SECTION 4. ROLES AND RESPONSIBILITIES IN FRAUD AND

CORRUPTION PREVENTION AND CONTROL

The following stakeholders are responsible for the implementation of internal and external

prevention mechanisms and controls to prevent and detect fraudulent and corrupt practices in

accordance with this Policy  
4.1 INTERNAL CONTROL  
Head of Organizationand his/her global senior management team  
The Head of Organizationand his/her global senior management team (the "Designees") will ensure the  
overall dissemination, implementation and adherence to this Policy.  
Personnel  
All Personnel of the Sudan Assist for Development Organization will:  
- Comply with this policy and  
- Understand the exposure to fraud and corruption in their area; and  
- Take appropriate measures to detect and report any suspicious of fraudulent and corrupt  
practices through the appropriate channels as set out in the SADO Code of Conduct and  
herein.  
Personnel who fail to report any suspicions of fraudulent and corrupt practices, may be held  
accountable as directly or indirectly tolerating or condoning improper activity.  
Managers  
All managers will ensure there are processes in place within their area of control to:  
- Identify and assess potential risks of fraud and corruption;  
- Reduce and prevent the risk of fraud and corruption;  
- Promote Personnel’s awareness of adherence to this Policy;  
- Ensure the dissemination of this Policy to contractors or suppliers and ensure its  
incorporation as necessary into any contractual instruments with such parties.  
Managers who fail to take appropriate action or who directly or indirectly tolerate or condone  
improper activity may themselves be held accountable.  
Human Resources Department  
The Head of Human Resources will ensure that fraud and corruption prevention and control is  
incorporated in key human resource activities including:  
- Recruitment and selection processes for Personnel, including the use of criminal background  
checks if necessary; verification of facts and documentation supporting applications for  
employment and volunteer placement; verification of employment history with the  
Sudan Assist for Development Organization at headquarters and field level and with Members; and reference  
checks;  
- Induction programme for new Personnel; and  
- Personnel’s development and training programs.  
The Head of Human Resources with the support of the Sudan Assist for Development Organization’s Legal Counsel  
will advise the Head of Organizationand his/her Designees to ensure that suspected allegations of fraud  
and corruption are fully investigated and sanctioned, and that such investigation procedures and

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disciplinary actions are fair, equitable and in accordance with the legal obligations of the  
organization.  
Finance Department  
The Head of the Finance Department will assist the Head of Organizationand his/her Designees in  
relation to:  
- Improvement of fraud and corruption prevention mechanisms and internal controls; and  
- The provision of advice on fraud and corruption prevention and control.  
SADO  
The Head of SADO will ensure that key elements of fraud and corruption  
prevention and control are incorporated in its undertakings including:  
- Obtaining accurate information on the business profile of the contractor or supplier;  
- Exercising due diligence in verifying that any contractors or suppliers have not engaged in,  
and is not engaging in, any fraudulent and corrupt practices;  
- Promptly reporting any practices that is, or is reasonably suspected of being, contrary to this  
Policy; and  
- Immediately ceasing any dealings with any party who is acting in a manner contradictory to  
this Policy.  
The Head of SADO, with the support of the Sudan Assist for Development Organization’s Legal  
Counsel, will ensure that contractual agreements with contractors and suppliers of goods and  
services prohibit fraudulent and corrupt practices with reference to this Policy.  
Risk Management and Audit Department  
The Head of the Risk Management and Audit Department will serve the Head of Organizationand  
his/her Designees by assessing the adequacy and effectiveness of internal controls and reports on  
omissions, weaknesses or deficiencies in order to facilitate corrective action. Reports from the Risk  
Management and Audit Department shall be considered by the Head of Organizationand his/her  
Designees to determine what action, if any, should be taken.  
Insurance Unit  
The Insurance Unit will ensure that key elements of fraud and corruption prevention and control are  
incorporated in its undertakings including:  
- Advising and obtaining proper coverage against fraud;  
- Filing any related claims upon the agreement of the Insurance Management Committee; and  
- Reporting back on progress of any claims filed.

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Legal Department  
The Legal Counsel will:  
- Provide advice to the Secretary General, his/her Designees and the Head of Human  
Resources to ensure that suspected allegations of fraud and corruption are fully investigated  
and that such investigation procedures and disciplinary actions are fair, equitable and in  
accordance with the rules and regulations of the organization; and  
- Support the Head of SADO, Head of Human Resources Department,  
Head of Organizationand other managers to ensure that this Policy is incorporated as necessary  
in the contractual instruments of the Sudan Assist for Development Organization.  
Finance Commission and Audit and Risk Committee  
In accordance with Article 29 of the Constitution of the Sudan Assist for Development Organization, the Finance  
Commission, with the support and advice of the Audit and Risk Committee, will ensure general  
oversight for the implementation and adherence to this Policy.  
4.2 EXTERNAL CONTROL  
External Auditors  
Pursuant to the Sudan Assist for Development Organization’s Financial Regulations, the external auditor will provide  
external oversight for the Sudan Assist for Development Organization.  
While the external auditor is not responsible for detecting fraud, if any cases of fraud are detected in  
the course of their audit work they shall to report it to the Head of Organizationand/or his/her  
Designees.  
Cooperating Partners, Contractors and Suppliers  
Any cooperating partners, contractors or suppliers will be required through contractual instruments  
to:  
- Allow access to specified records concerning the Sudan Assist for Development Organization; and  
- Represent that it has not, and shall not, engage in, any fraudulent or corrupt practices.  
SECTION 5. HANDLING OF ALLEGATIONS  
The handling of any allegations of fraud or corruption including investigations and any eventual  
disciplinary measures and/or pressing of civil or criminal charges shall be in accordance with the  
Standards for Investigation for the Risk Management and Audit Department and the International  
Federation’s Disciplinary Measures, its Staff Regulations and this Policy.

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Reporting of Fraudulent or Corrupt Practices  
As per the SADO Code of Code and Staff Regulations, Personnel who have knowledge of an  
occurrence of fraud or corruption, or has reason to suspect that a fraudulent or corrupt act has  
occurred, have a duty to promptly report any reasonable allegations through the channels identified  
therein. Personnel are reminded that a confidential service, currently managed by “Safecall”, is also  
at their disposal to report any suspected fraudulent or corrupt activities.  
The Sudan Assist for Development Organization will use its best efforts to ensure that Members, cooperating partners,  
contractors and suppliers report allegations of fraud and corruption to their contact person at the  
Sudan Assist for Development Organization.  
Proven abuse of the process by raising knowingly false, vexatious or malicious allegations will be  
regarded as a serious breach of the SADO Code of Conduct, and may also result in disciplinary  
measures or legal action.  
Confidentiality of Information and Identity Protection  
Members, Personnel, cooperating partners, contractors and suppliers who reported in good faith  
suspicions of fraud or corruption shall not discuss the matter with anyone other than the person to  
whom the report is made, unless it was not addressed to the right person in the first place or, as  
otherwise directed.  
The Sudan Assist for Development Organization will take all appropriate measures to ensure that information reported  
remains confidential and is only disclosed to authorized individuals and investigators.  
The Sudan Assist for Development Organization will protect the identity of those reporting in good faith any suspicions  
of fraud and corruption and take appropriate measures to protect them from retaliation. In case of a  
reasonable fear of adverse reaction from the person whom they reasonably suspect as having  
committed a fraud or a superior, reports may be made anonymously. In situations whereby the  
person reporting the incident is needed to provide evidence, that person identity should only be  
revealed with his/her consent or if required by law.  
Security of Data  
To ensure that all documentation relating to an alleged fraud or corruption is available for review in  
its original form immediate action to prevent the theft, alteration, or destruction of all such  
documentation will be taken. Such actions may include, but are not necessarily limited to:  
- Removing the documentation, computers, hard disks and any electronic data storage media  
from its current location and securing it in another location;  
- Limiting access to the location where the documentation, computers, hard disks and any  
electronic data storage media currently exists;  
- Preventing the individual suspected of committing the fraudulent or corrupt act from having  
access to the documentation, computers, hard disks and any electronic data storage media  
pending the investigation; and  
- Obtaining urgent advice from a suitably qualified internal or external expert in connection  
with the handling of electronic documentation or media.

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Investigation  
The Sudan Assist for Development Organization will promptly and efficiently investigate suspected instances of fraud  
and corruption in accordance with the Standards for Investigations for the Risk Management and  
Audit Department and / or the Sudan Assist for Development Organization’s Disciplinary Measures, the Staff  
Regulations and this Policy.  
Any investigation pursuant to this Policy will be conducted impartially, fairly and thoroughly.  
Whistle Blowing Protection  
Where there is proof of fraud or corruption, appropriate disciplinary action will be taken against  
Personnel in accordance with the SADO Code of Conduct and Staff Regulations.  
The Sudan Assist for Development Organization has a zero tolerance policy to any form or retaliation against a person  
who either reports reasonably-held suspicions of fraud or corruption, or who cooperates in any such  
investigation.  
Deterring anyone from reporting suspicions of fraud or corruption or witnessing such acts in an  
investigation is a serious breach of the SADO Code of Conduct and may result in disciplinary  
measures.  
Recovery Measures  
The Sudan Assist for Development Organization may seek to recover any losses resulting from fraudulent or corrupt  
activity 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 the relevant contractual arrangements.  
SECTION 6. MONITORING  
Monitoring and Evaluation  
Following any proven incident of fraud or corruption, the Head of Organizationand his/her Designees,  
with the assistance of the Head of Risk Management and Audit, will conduct a review of relevant  
policies, procedures and internal controls in the area where the fraud or corruption occurred to  
assess whether these need to be revised and what, if any necessary corrective measures need to be  
undertaken.  
SECTION 7. EXTERNAL COMMUNICATIONS  
Communication and Coordination with External Parties  
The Sudan Assist for Development Organization will share with external parties best practices on fraud and corruption  
prevention and control and information when necessary to address specific situations. Personnel  
shall however refrain from sharing any information related to allegations of fraud or corruption,

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including to Members, to unauthorized individuals and refer any request for information to their  
supervisor.  
Communication and Media Strategy  
No public statement or comment in relation to an alleged fraudulent or corrupt practice may be  
made to the media except by the Sudan Assist for Development Organization’s specifically appointed authorised  
representative.

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APPENDIX 1 – Examples of potential fraudulent or corrupt practices  
This list is not exhaustive and not all instances will upon investigation be proven to be fraud or  
corruption but may indicate an area where changed work practices are necessary:  
• theft of supplies and equipment  
• improper use of an Sudan Assist for Development Organization’s credit card  
• improper use of Sudan Assist for Development Organization’s official stamp  
• use of monies identified for specific programme activities for unrelated programmes  
• a false or excessive claim for expenses or allowance  
• payment of salary or wages to a fictitious employee  
• false work attendance record or timesheet  
• submission of false sick leave document signed by a doctor  
• not recording leave taken or the false classification of leave  
• unauthorised payments to or transactions with related parties  
• acceptance of offers, receiving or offering kickbacks or bribes for a preferential treatment  
• payment for work not performed  
• making or use of forged credentials and endorsements  
• altering amounts and details on documents  
· collusive bidding;  
· overcharging;  
• writing off recoverable assets or debts  
• unauthorised transactions  
• selling information  
• altering donations, stocks and assets records  
• cheques made out to false persons  
• including false persons on the payroll  
• unrecorded transactions  
• transactions (expenditure/receipts/ deposits) recorded for incorrect sums  
• cash borrowed without authorization or stolen  
• supplies or equipment stolen or borrowed without authority  
• substituting new goods for old  
• manipulation of the procurement process, including undisclosed conflict of interest  
• not recording donations wholly or partially  
• make or use false official identification, including false email identification  
• damaging or destroying documentation  
• not disclosing all documentation  
• using copies of records and receipts  
• false invoicing, including using imaging and desktop publishing technology to produce  
apparent original invoices charging incorrect accounts in order to misappropriate funds  
• deliberately delaying terminations from payroll  
• running a private business with official assets  
• using facsimile signatures

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• false compensation and insurance claims  
• stealing of discounts  
• selling waste and scrap  
• inappropriate or unapproved use of computer generated signatures  
• downloading of confidential information and/or source codes and forwarding this to an  
unauthorised party  
• presentation of false documentation or statements about personal past experience, education  
or certificates / diploma  
• inappropriate use of assets for personal purpose  
• use of information for personal gain or advantage  
• management override of an internal control