



**Afghanistan Educational & Health Development Aid
Organization (AEHDA)**

Anti-Fraud and Corruption Policy

Approved by:

Chair of BoD

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Foreword

It is an honor to introduce Afghanistan Educational & Health Development Aid Organization (AEHDA)'s Anti-Fraud and Corruption Policy.

The Anti-fraud and Anti-Corruption Policy purports to drive the performance of coordinated actions against fraud or corruption, promote transparency in administration, deter wrongful conducts and foster commitment of (AEHDA) in a fight against fraud and corruption, and to that end it bases or applies enforceable regulations in each of the provincial offices in which AEHDA operates.

AEHDA has developed this policy and applies it to all staff. This policy requires a heightened commitment.

I thank everyone who contributed to this policy. We look forward to continuing to engage with and learn from others as we strengthen and refine our approach to this important issue.

Chairperson for Board of Directors

AEHDA ORG

Background

The Afghanistan Educational and Health Development Aids Organization (AEHDA) is a non-profit, non-political, non-sectarian, and non-governmental organization. Originally established as an association in July 2003, AEHDA underwent additional registration with the Ministry of Economy (MoE) at the end of 2020, officially becoming an NGO with registration number 5085. AEHDA's mission spans education, a One Health Approach, healthcare, public nutrition, water, sanitation, hygiene, food security, advocacy and communication, training, capacity building, as well as research and development.

Introduction

Fraudulent and corrupt practices can seriously damage AEHDA Org's reputation and diminish donors' trust in its ability to deliver results in an accountable and transparent manner. It also can affect staff and personnel effectiveness, motivation and morale, and impact on the organization's ability to attract and retain a talented work force.

Fraud and corruption are not acceptable in our workplace and in our contacts with others as it also undermines the integrity and reputation of the organization. It is essential for each employee to be committed to this policy.

Definitions

Fraud: It is the use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the organization's resources or assets.

It is the intentional activity to gain personal benefit directly or indirectly illegally, against organization or entity policy.

Corruption: It consists of the abuse or misuse of a position of trust or power for personal benefit rather than the purposes for which trust, or power was conferred. It is a direct or indirect offer or receipt of any payment, service, gift, loan, fee, reward, other advantages or anything else of value or consideration to or from any person as an inducement to do or refrain from doing something or to influence a decision.

Scope of Policy Application

This policy sets out Afghanistan Educational & Health Development Aids Organization (AEHDA) 's approach to prevent and respond to fraud and corruption. The policy aims to prevent, detect and

address acts of fraud and corruption involving employees, volunteers, suppliers and subcontractors.

Afghanistan Educational & Health Development Aids Organization (AEHDA) has zero tolerance for fraud and corruption and this policy applies to all projects and programs' activities and operations of AEHDA.

Objectives

- Prevention: Reducing the risk of fraud or corruption in the first place;
- Detection: Uncovering fraud or corruption at the earliest opportunity if it occurs and providing effective options to report, manage and respond;
- Response: Taking immediate corrective action and remedying the harm caused by fraud and corruption, including the preservation of crucial evidence to achieve a successful outcome.

Policy Statement

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to corruption, bribery, fraud or other financial irregularity and we are committed to acting professionally, fairly and with integrity in all our dealings and relationships wherever we operate and in implementing and enforcing effective systems to counter any acts of bribery or corruption.

Fraud and corruption are a gross misconduct and are therefore grounds for termination of employment.

In case that a AEHDA employee develops concerns or suspicions regarding fraud and corruption by a colleague, he or she must report such concerns immediately.

All AEHDA employees, volunteers and subcontractors are obliged to create and maintain an environment free of fraud and corruption and promotes the implementation of this policy.

Finance department has particular responsibilities to support and develop systems which maintain this environment.

All newly employed staff should inform about the AEHDA Anti-fraud and corruption policy during their induction. It is the responsibility of the provincial management office where staff are stationed to ensure that all staff members receive orientation on this policy.

Some Examples of Forbidden Acts

- Give or promise to give, 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;
- Give or promise to give, a payment, gift or hospitality to a government/ donor official, agent or representative to facilitate or expedite a routine procedure or approval process;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- 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 by us in return;

- Forging documents, preparing false entries in AEHDA ORG’s systems or making false statements to obtain a financial or other benefit;
- Collusion or other anti-competitive scheme between suppliers during a procurement process;
- Forging a document to be from AEHDA Org to induce a party outside AEHDA ORG to act;
- Accepting gifts and hospitality such as meals or entertainment from a vendor;
- Processing the cost of personal travel as part of an official travel;
- False statement regarding educational credentials or professional qualifications, on a personal history form in order to obtain a job;
- Falsifying documents, making false statements, preparing false entries in AEHDA Org systems or other deceptive acts to discredit a person, program or the organization;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

Awareness

Anti-fraud and anti-corruption awareness-raising trainings organize internally for staff in AEHDA ORG as well as for project staff, subcontractors who manage activities and operations. The operation department leads these activities.

Prevention

Fraud and corruption can be minimized through carefully designed and consistently operated management procedures, in particular, financial policies and procedures and financial regulations. Segregation of duties in use of financial systems is practiced, so, for example, no individual has undue management of payments, income, or assets.

The organization has clear roles and responsibilities, with set levels of authority for authorizing transactions.

Systems will be protected with electronic access restrictions to prevent the possible misuse of information technology.

AEHDA holds mandatory trainings for all employees and volunteers on organization’s anti-fraud and corruption policy.

The following measures will be taking in order to prevent fraud and corruption:

- Background check applies in recruitment procedures to ensure on suitability for working with AEHDA;
- All staff, volunteers and subcontractors have access to a copy of anti-fraud and corruption policy;
- All newly recruited staff and volunteers receive briefing on this policy;
- Strictly follow the finance policy and guideline to minimize the risk;
- Ensure that a culture of openness exists to enable any issues or concerns to be raised;
- Every workplace will have the appropriate contact details to report fraud and corruption;
- Keep the line manager informed of what are staff doing;
- Ensure where there are concerns about fraud and corruption, appropriate actions are taken to address those concerns.

Response

- Reporting: AEHDA ORG has safe, confidential and accessible mechanisms and procedures for employees to report fraud and corruption and ensures that everyone is aware of these.
- Investigation: AEHDA ORG investigate all allegations properly and immediately by its employees.
- Referral to Police Authorities: If, after proper investigation, there is evidence to support fraud and corruption, these cases may be referred to police for criminal prosecution.

Reporting

Employees should raise concerns about suspected bribery, fraud or other form of corruption and financial irregularity of other employees with their line manager without delay (if the concern relates to an individual's line manager, then the individual should raise it with their line manager's manager).

The line manager should either ask the individual to put their concern in writing, or interview them and record their concerns in writing. The line manager will notify the finance director without delay.

AEHDA establishes a reporting channel and empowers all staff (both at main and field offices) and make it their obligation to report all witnessed and suspected breach of AEHDA ORGANIZATION 's anti-fraud and corruption policy.

Investigation

On receipt of a report of a concern under this policy or the whistleblowing policy, as the case may be, the finance director will determine whether the matter should be investigated by AEHDA's Internal Audit, whether other specialist auditors are required; and whether the matter should be reported to the police. If the finance director is involved the chairperson of audit committee will direct the investigation.

AEHDA reserves the right to notify the police where it believes a criminal offence has taken place. Any action taken in accordance with AEHDA's disciplinary procedures will be independent of any police investigation. The finance director shall take appropriate action for the prevention of any further loss and for the recovery of any loss suffered, including legal costs where appropriate. Recovering losses is a major objective of any fraud investigation. Internal audit or the internal investigator (as appropriate) shall ensure that in respect of all investigations of financial irregularity, the amount of any loss will be calculated. Repayment of loss should be sought in all cases.

All information received is treated confidentially by investigation team. Investigations will not be disclosed to, or discussed with, anyone other than those who have a legitimate need to know.

Responsibilities

AEHDA Board of Directorate is responsible for the application and implementation of this anti-fraud and corruption Policy through Management Teams in Central Management Office and Provincial Management Offices. All managers are expected to report fraud and corruption to this finance director.

Misconduct of Policy

AEHDA will immediately suspend any employee or volunteer who violated this Policy. AEHDA is fully authorized to take any disciplinary action against any of its staff who have proven guilty, which include termination and reporting to police. AEHDA will also take appropriate action against those who were aware of fraud and corruption and did not report it.

Our Commitment

AEHDA ORG, through the provincial offices that make up the organization is committed to a zero-tolerance policy regarding fraud and corruption events of any kind and maintains the highest professional and ethical standards in the way it conducts its services. AEHDA ORG make every effort to create and maintain a safe environment, free from fraud and corruption and will take appropriate prevention and response measures for this purpose. This policy affirms AEHDA ORG commitment to take special measures for prevention from fraud and corruption and apply it equally to all employees, volunteers, suppliers and subcontractors who carrying out work on behalf of AEHDA ORG, irrespective of location and position. Successful implementation of this policy requires the active participation of all employees in the central management office and provincial management offices regardless of their position. The staff are required to undergo both acceptance of and commitment to this policy. The prevention, detection and reporting of fraud and corruption are the responsibility of all those working for us or under our control. All staffs are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The policy has been endorsed by the board of trustees and clarify the organization's stance on and commitment against fraud and corruption.