

PREVENTION OF SEXUAL EXPLOITATION & ABUSE POLICY

Process Owner & Approving Authority

CEO

1.0 Overview

Aflatoun's employees are highly valued and respected individuals, and we ensure they are not exposed to any form of sexual mistreatment.

2.0 Objectives

The aim of this policy is to ensure all staff understand and respect each other's rights of protection from sexual exploitation and abuse.

3.0 Eligibility & Coverage

The following groups must comply with this Policy in the course of their work and when representing AFLATOUN:

- AFLATOUN Employees
- All program participants
- All Network Partners
- All Consultants and workers associated with Aflatoun programs
- Aflatoun Board members

All persons identified above must comply with the standards of Aflatoun set out in AFLATOUN's Prevention of Sexual Exploitation and Abuse Policy.

4.0 Policy Statement

Critical to the operations of Aflatoun, is the respect for the dignity and basic human rights of people throughout the world. Every individual who represents Aflatoun is expected to reflect these values in their daily professional conduct, regardless of who they are dealing with, or where they are working.

Aflatoun condemns in any form or shape of sexual exploitation and abuse in all its operations and those occurring anywhere in the world.

Sexual exploitation and abuse (SEA) is a violation of basic human rights. Aflatoun aims to provide a safe and trusted environment that safeguards everyone from SEA including network communities, workers, program participants and partner organizations.

Please refer to ANNEX C of the HR manual for the full PSEA.

D. ANTI-FRAUD & CORRUPTION POLICY

Process Owner & Approving Authority

CEO

1.0 Overview

To achieve its mission, Aflatoun must prevent any fraud and corruption. Aflatoun ensures that its funds are used in the most efficient, effective and transparent manner. Therefore, Aflatoun takes immediate action for any incidence of fraud and corruption.

2.0 Objective

The purpose of this policy is to:

- Prevent any fraud and corruption that affects Aflatoun's supported projects.
- Directs the Aflatoun stakeholders to maintain and enhance a fit-for-purpose, risk-based Anti-Corruption Framework applicable to all Aflatoun activities.

3.0 Eligibility & Coverage

This policy covers all Aflatoun board, employees, volunteers, interns, consultants, contractors, partners and vendors.

4.0 Policy

To enhance its operations, Aflatoun prevents its board, employees, partners, volunteers to engage in any corruption. At Aflatoun, we recognise that fraud and corruption affect the organization financially and strategically.

Aflatoun works on four principles that sets the direction for Aflatoun:

Zero tolerance: Aflatoun has a zero-tolerance approach towards fraud or any other prohibited practices. Aflatoun maintains a firm, effective and adequate response to instances of prohibited practices when detected.

Partnership: Aflatoun implements this policy by aligning, where appropriate, with existing best practices such as international conventions, and compliance systems and environments. Aflatoun engages with its partners in the collective efforts to prevent, detect and respond to fraud and corruption.

Transparency: Aflatoun iterates its commitment to transparency in Aflatoun activities, recognizing the challenging yet essential role, public disclosure and transparency in driving accountability as well as fraud and corruption prevention and detection.

Country Ownership: Consistent with the Aflatoun principle of country ownership, Aflatoun recognizes that country stakeholders are the ultimate owners of the fight against fraud & corruption. They also own the responsibility to prevent, detect, and respond to Prohibited Practices.

Definitions

Fraud: Fraud is an intentionally deceptive action designed to provide the perpetrator with an unlawful gain or to deny a right to a victim.

Corruption: Corruption is a dishonest behaviour by those in positions of power. Corruption includes giving or accepting bribes or inappropriate gifts, under the table transaction, money laundering, defrauding investors.

The examples of fraud and corruption are below but are not limited to only these:

- A Corrupt Practice is the offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improper actions of another party. Corrupt Practices include, but are not limited to, bribery, kickbacks and facilitation payments in connection with Aflatoun Activities.
- Manipulation of any information arising from or relating to Aflatoun Activities such as proposals, plans, evaluations, invoices, signatures, performance data, epidemiological data, reports, and audits.
- Abusive practices include the theft, misappropriation, embezzlement, waste or improper use of property, either committed intentionally or through reckless disregard. For the avoidance of doubt, this includes without limitation diversion of Aflatoun money, as well as assets purchased with Aflatoun money.
- An intentional or reckless act of discrimination, reprisal, harm, harassment or retribution, direct or indirect, which is recommended, threatened or taken against anyone who either refuses in good faith to participate in the facilitation or commission of any fraud or who in good faith reports suspicion or knowledge of fraud to the appropriate channels in Aflatoun or within Implementers or Counterparties.
- Claim the cost of personal travel as business travel.
- Sending misinterpreting educational credentials or professional qualifications for a job application.
- Falsifying the documents and doing false entries in the system.
- Money Laundering: It is: (i) the conversion or transfer of property, directly or indirectly, knowing that such property is from criminal activity, or helping any person who is involved in such activities evade the legal consequences of their actions; (ii) concealing or disguising the illicit origin, source, location, disposition, movement or ownership of property knowing that such property is from criminal activity; or (iii) the acquisition, possession or use of property, at the time of receipt that such property is from criminal activity.

Prevention Measures

Compliance with this policy is the ethical and professional responsibility of each covered person. Each Covered Person is expected to adhere, respect and communicate this policy in connection with (i) her/his activities, (ii) employee activities she/he supervises, and (iii) where possible, concerning the activities of implementers and counterparties with whom she/he works, at the outset of the relationship and on an ongoing basis thereafter.

- Fraud awareness: It is a collective responsibility to prevent any fraud and corruption. It is the responsibility of line managers to raise awareness. All employees must report any fraud and corruption.
- Preventing fraud into new projects: Programme or project line managers are responsible for ensuring that the fraud or corruption risks are identified while designing the new projects
- Gifts: Giving or receiving gifts on behalf of Aflatoun under any circumstances is not acceptable. Any kind of hospitality or entertainment shall be accepted with care. It shall not be for any kind of favour with improper intention and shall not come under bribe and corruption. It has been expected from employees and board to use their judgement while accepting any kind of hospitality and entertainment.
- Prevention, detection and response to the failure to declare a conflict of interest in obligated.
- Aflatoun implements and maintains processes to prevent, detect and respond to any retaliation against any Covered Person.
- Aflatoun must be able to directly oversee and verify all aspects of Aflatoun activities, including to prevent, detect and respond to Prohibited Practices. To this aim, all Covered Parties must collaborate, participate and enable related activities, notably by granting unfettered access to Aflatoun and its representatives to any records, individuals and sites linked to Aflatoun Activities. This will notably be done through contractual instruments making this duty applicable by the Secretariat to all Covered Parties.

Responsibilities

Board of directors: Board of Aflatoun has full ownership and responsibility to ensure that immediate actions are taken in all the instances of fraud and corruption.

Staff and Senior line managers: It is the responsibility of senior staff and line managers for ensuring that the staff is well aware of this policy. They shall increase employee's awareness regarding fraud and corruption.

It is the responsibility of all the employees to carry out their work and conduct themselves as per the policy.

Organization: It is the responsibility of the organization to carry out regular assessments of present or future risks of fraud and corruption within the organization.