



**ACGC**  
ALBERTA COUNCIL FOR  
GLOBAL COOPERATION

Policy

# **ANTI-FRAUD AND CORRUPTION**

Policy name: Anti-Fraud and Corruption Policy

Policy type: Organizational



## POLICY STATEMENT

Fraud and corruption is a rising issue in society, and can have harmful effects on the organization's ability to carry out its vision and mission. ACGC must meet high ethical standards in order to merit the trust of its partners and clients, as well as donors, governments and the public. As a coalition of civil society organizations, any allegations or actual cases of the misuse of funds not only risks the integrity of ACGC, but also that of the international cooperation sector as a whole. As such, ACGC is committed to ensuring board members, employees, consultants, interns, volunteers, and any person or entity acting on behalf of or for the organization, act ethically with honesty and transparency, and steward the resources responsibly and for their intended purposes at all times. ACGC takes all allegations or actual cases of misuse of funds, fraud, collusion, corruption, funding of terrorism or criminal activity, or financial irregularity seriously, and **has zero-tolerance for fraud and corruption.**

The purpose of this policy is to outline the organization's commitment to anti-fraud and corruption, and minimize the risk of occurrences within the organization through outlining how the organization will **prevent, report, investigate and respond** to allegations of the misuse of funds and resources.

### \*\*\*Report Fraud and Corruption\*\*\*

Annex A provides a list of examples of fraud and corruption

Annex B provides a template for making a report

**Submit a confidential report electronically to one of the following email addresses:**

- Report fraud and corruption: [director@acgc.ca](mailto:director@acgc.ca)
- Report fraud and corruption of executive leadership: [chairperson@acgc.ca](mailto:chairperson@acgc.ca)

## SCOPE

This policy applies to board members, employees, consultants, interns, volunteers, and any person or entity acting on behalf of or for the organization, at all times, herein referred to as 'parties.'

This policy complements the Gift and Sponsorship Policy and the Conflict of Interest Policy, and is reiterated through organizational Anti-fraud and Corruption procedures, Financial Operations Policy and Procedures, and Procurement Policy and Procedures.

## DEFINITIONS

There is significant discussion around what words and concepts mean. For the purposes of this policy, key terms include:

**Corruption:** Corruption is the abuse of entrusted power for private gain. [Transparency International]

**Fraud:** Fraud is the offence of internationally deceiving someone in order to gain an unfair or illegal advantage (financial, political, or otherwise). [Transparency International]

**Whistleblowing:** A whistleblower discloses information about corruption or other wrongdoing being committed in or by an organisation to individuals or entities believed to be able to effect action – the organization itself, the relevant authorities, or the public. (Transparency International)

See **Annex A** for a list of examples of fraud and corruption.

## POLICY ELEMENTS

### Policy Principles

- 1.1 ACGC maintains **zero-tolerance** for fraud and corruption in the organization, and shall not tolerate fraud or corruption by staff, board of directors, implementing partners, volunteers and sub-contractors, any person or entity acting on behalf of or for the organization.
- 1.2 All staff, board of directors, implementing partners, volunteers and sub-contractors, any person or entity acting on behalf of or for the organization are expected to uphold their duty to prevent fraud and corruption, steward the resources responsibly and for their intended purposes at all times, in compliance with this policy.

## POLICY ELEMENTS

- 1.3 ACGC is committed to the prevention, reporting, investigation, and response to all forms of fraud and corruption impacting the organization through ensuring the following:
  - 1.3.1 **Prevention:** Processes, procedures, and training will be maintained to deter and detect fraud and corruption, with the ultimate duty and obligation placed on the management and governance of the organization.
  - 1.3.2 **Reporting:** Reporting mechanisms will be in place to allow parties within and external to the organization to immediately and confidentially report suspected incidences of fraud and corruption, ensuring protection for whistleblowers.
  - 1.3.3 **Investigation:** ACGC will investigate all reports of fraud and corruption fairly, and neutrally, and in a responsible manner with efforts to protect the rights and privacy of all involved, involving and cooperating fully with local authorities, and informing donors as required.
  - 1.3.4 **Response:** ACGC will place immediate and appropriate sanctions on those who committed fraud and corruption, and make all efforts to recover funds or resources obtained or given fraudulently. Any weaknesses in processes or procedures resulting in fraud and corruption to take place will be remediated immediately.
- 1.4 All contracts and agreements with staff, board of directors, implementing partners, volunteers and sub-contractors, any person or entity acting on behalf of or for the organization will comply with this policy.
- 1.5 Internal procedures will be developed and reviewed regularly to deter and detect, investigate, and report, and respond to fraud and corruption in an appropriate and timely manner.
- 1.6 ACGC is committed to transparency and is committed to keeping staff, members, donors, and the public informed as necessary, upholding the rights of individuals involved, the integrity of the organization, and in a manner that does not compromise an ongoing investigation.

## POLICY ELEMENTS

### Policy Responsibilities

- **Board of Directors:** The ultimate responsibility of policy review and organizational compliance, remain with the Board of Directors. The Board will managing the investigation, and response of reported fraud against the Executive Director
- **Executive Director:** Responsible for the implementation of the policy and managing fraud and corruption, including ensuring prevention, reporting, investigation, and response procedures are in place and followed, and updated as necessary
- **All Parties:** All board members, employees, consultants, interns, volunteers, and any others working on behalf of the organization have a responsibility to work towards the realization of the policy and procedures set forth
- **Members of the public:** Reporting any incidences of suspected fraud and corruption to [director@acgc.ca](mailto:director@acgc.ca) or to [chairperson@acgc.ca](mailto:chairperson@acgc.ca) for cases involving the Executive Director

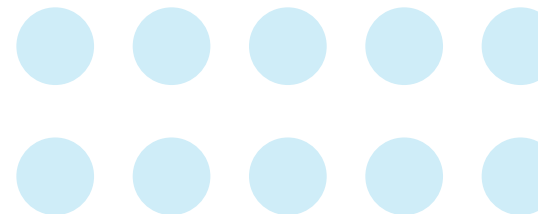
### Policy Review

The Fraud and Corruption Policy strives to reflect current concepts and terms, and will be informed, revisited, and revised regularly based on emerging needs and best-practices.

**Approval Date:** 18 June 2022

**Date of Last Amendment:** June 2022

**Date for Review:** Spring 2026





## ANNEX A: EXAMPLES OF FRAUD AND CORRUPTION

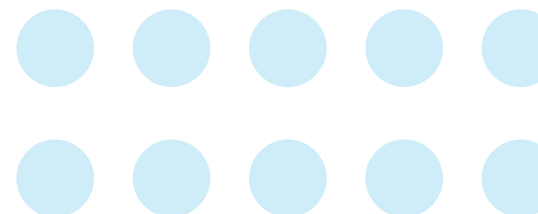
The following list examples of corruption and fraud. This list should not be considered exhaustive.

### **Corruption**

- Abuse or misuse of power
- Extortion - the act of obtaining something by force, threats or undue demands
- Favouritism - unfair favouring of one person or a group with something at the expense of others
- Nepotism - favouring a family member or friend with something at the expense of others
- Collusive behavior with vendors, partners, or other entities
- Embezzlement or theft
- Bribery, kickbacks and/or gratuities - offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust
- Sharing of profits / kick backs, cuts, or discounts for personal benefits
- Paying ransom
- Improper use of organization's resources for personal gain
- Receiving or providing financial or non-financial favors with the intent of facilitating activities that the person may not normally receive
- Using organizational resources, in cash or in kind, to support a political party
- Taking advantage of an opportunity for personal or organizational benefit in violation of the Conflict of Interest policy
- Accepting or seeking gifts of material value from suppliers or persons providing services/materials in violation of the Gift and Sponsorship Policy
- Supporting activities of criminal or terrorist groups or organizations (as defined in the Criminal Code R.S.C., 1985, c. C-46 or those appearing on the Consolidated United Nations Security Council Sanctions List)

## Fraud

- International concealment, omission, falsification or perversion of truth
- Any dishonest or fraudulent act
- Creating false records
- Creating false claims (e.g. requesting payment for goods, services or activities not actually performed, or reporting activities or results to the donor which were not actually performed)
- Forgery or alteration of any document or account (including, but not limited to payroll, accounts, travel and expense reports, procurement documents or inventory/asset registers)
- Forgery or alteration of a cheque, bank draft, contract, or any other financial documents
- Misappropriation of funds, equipment, or other assets
- Misappropriation of donor-allocated resources for purposes other than intended
- Impropriety in the handling or reporting of money, financial transactions, donor financial reporting or contract bidding procedures
- Destruction or misappropriation of physical and digital records, property, or equipment
- Diversion, alteration, or mismanagement of documents or information, and/or any similar or related irregularity
- Knowingly engaging in transactions or colluding with individuals or entities that have been convicted by a court for an offence involving fraud, bribery or corruption, or are under sanction for such practice by a government or another organization
- Any malicious use of internet and digital documents or messages
- Engaging in cybercrime and/or identity theft



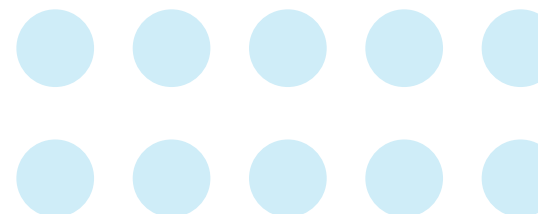


## ANNEX B: INITIAL REPORT OF FRAUD AND CORRUPTION

Pursuant to ACGC's Anti-Fraud and Corruption policy, it is a duty on all to immediately report suspected incidences of fraud and corruption. This form should be submitted in all cases regardless of donor, amount, or materiality, and is the first step in preparing a full investigation.

This report should be submitted electronically to the Executive Director at [director@acgc.ca](mailto:director@acgc.ca) where possible within 3 days of discovering the incident. Should the incident may involve the Executive Director, the report should be sent to [chairperson@acgc.ca](mailto:chairperson@acgc.ca) within the same time frame. You may be asked to confidentially provide additional details, documentation, or evidence to help in a full investigation should it be necessary.

*Your protection is important: ACGC will not tolerate any retaliation or reprisal against anyone who, in good faith, reports a potential violation of this policy following the procedures provided. Further, every effort will be made to protect the privacy and confidentiality of everyone involved in a report of a violation of this policy, including the individual who in good faith alleged the complaint.*





## Annex B: Initial Report of Fraud and Corruption

Pursuant to ACGC's Anti-Fraud and Corruption policy, it is a duty on all to immediately report suspected incidences of fraud and corruption. This form should be submitted in all cases regardless of donor, amount, or materiality, and is the first step in preparing a full investigation.

This report should be submitted electronically to the Executive Director at [director@acgc.ca](mailto:director@acgc.ca), where possible within 3 days of discovering the incident. Should the incident may involve the Executive Director, the report should be sent to [chairperson@acgc.ca](mailto:chairperson@acgc.ca) within the same time frame. You may be asked to confidentially provide additional details, documentation, or evidence to help in a full investigation should it be necessary.

**Your protection is important:** ACGC will not tolerate any retaliation or reprisal against anyone who, in good faith, reports a potential violation of this policy following the procedures provided. Further, every effort will be made to protect the privacy and confidentiality of everyone involved in a report of a violation of this policy, including the individual who in good faith alleged the complaint

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### To be Completed by Whistleblower

Type of suspected fraud or corruption (See list of examples, Annex A):	
Date of discovery:	
Method of discovery:	
Details:	
Names of those involved in incident:	
Amount or value (estimate if necessary)	
Initial control weaknesses or systems failures identified by reporting party:	

### To be completed by management

Initial internal control weaknesses or systems failures identified by management:	
Initial remedial actions taken:	
Potential for additional related fraud or corruption losses:	
Initial determination of fraud/corrupted amount:	
Initial determination if donor reporting is required:	
If yes, provide the date of report, as well as the name and contact of donor representative	
External investigation required (YES/NO)	

[Attach additional pages or attachments if necessary]

\_\_\_\_\_  
Full name of Management

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date