



ANTI-CORRUPTION POLICY

Introduction

Kids of Uganda operates in a context where corruption is common at all levels of society, and may affect the organization's activities.

Since corruption always strikes the weakest in society (and children are one of these groups), Kids of Uganda has zero tolerance to corruption. Kids of Uganda never accepts corruption in any form and shall always investigate all matters concerning suspected corruption or fraud.

Corruption in the Ugandan context

Corruption in Uganda often takes the form of bribes and "administrative expenses" that lead to people having to pay for community services that otherwise are provided free of charge or at a lower cost.

In the context where Kids of Uganda's programs are carried out, conditions are also further complicated, as local relations play a central role in the community. This usually contributes with positive effects, but also leads to individuals often being considered to have a duty to the collective, a duty that can vary in scope but often affects social and economic issues. In the case of Kids of Uganda, this can lead to pressure to help personal acquaintances, rather than the most needy.

Applicability

Kids of Uganda applies this anti-corruption policy in all operations. All staff, interns, board members and volunteers, either working directly with Kids of Uganda or indirectly via a partner organisation, are bound by this policy.

Definitions

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.

Corruption: Corruption is the abuse of trust, power or position for private gain, including bribery and nepotism.



Examples

Examples of fraud and corruption includes, but is not limited to:

- Intentionally improper accounting
- False, duplicate or inflated invoices or receipts
- Withholding of Kids of Uganda financial resources for private use
- Diversion of resources during distribution or supply to projects
- Intentionally improper supervision or monitoring of projects; hiding facts
- Demanding or accepting gifts from families in the Family Support Program, colleagues or board members, unless the gift is of insignificant value.
- Leaving a gift or reward (or a future promise of a gift or reward) to an official in authority, company or organization, for winning advantages or unfair services
- Biased recruitment of families to the Family Support Program
- Biased recruitment of staff or board members
- Unauthorized use of material and goods, including IT and communication technologies such as mobile phones, mobile data and printers
- Kickback arrangements in procurement of goods and services
- Not working the number of hours agreed upon in the employment contract
- Not reporting absent days or sick days
- Sharing internal documents or information with external bodies unless approved by the board of Kids of Uganda
- Signing contracts or making agreements for the organisation, economically or in any other way, beyond your authority

Preventive measures

Transparency and accountability: Any person bound by this policy must adhere to the principles of transparency and accountability. Transparency means that we communicate openly with each other and share documented policies and procedures. Accountability means that we take responsibility for our actions and we hold ourselves and each other accountable.

Informing about impartiality: Any person bound by this policy cannot participate in decisions when their impartiality can be questioned. Any person bound by this policy must inform the board of Kids of Uganda about eventual situations where their impartiality can be questioned.

Knowledge of the policy: The chairpersons of Kids of Uganda and Kids Foundation Uganda will ensure that everyone bound by this policy is aware of the policy and work actively to ensure that the policy is being followed.

Awareness of when risks may arise: A common denominator for the problem of corruption is that the lack of structure and guidelines is a recurring danger that constitutes risk areas. Due to this, the common denominator for these identified risk areas is also that they are all transitional phases, ie.



events that are characterized by the business changing, entering a new phase, or taking a new turn. It is important that everyone understands that risks may arise in these situations. Examples are when new posts are to be filled, new families are admitted to the family program, or contracts are to be signed with a local party.

Risk analysis and preventive measures: Before starting an intervention, or in the event of major changes in the organisation's operations, a risk analysis should be carried out. This should include anti-corruption. Based on this, preventive measures are designed that aim to reduce or prevent the risk of corruption. If the risk of corruption is considered high, the effort should not be started.

Reporting and investigation

Reporting: Everyone who is bound by this policy has an obligation to act in case of suspicion by informing the board of Kids of Uganda. In case you want to stay anonymous, we suggest creating an anonymous email account and sending an email to a minimum of two board members. Include answers to the questions “What is suspected?”, “Who is suspected?” and “Is there evidence?”

Internal investigation: If a suspicion of corruption arises within the organization, an internal investigation must be initiated. This aims to map out what happened, who was responsible, and (if sufficient reasons exist) broad measures.

Disciplinary Measures

The decision on what measures should be taken shall be decided by the board of Kids of Uganda, following a vote. Prior to such a decision, the board must have investigated the matter carefully, and all those involved must have been given their version of events. Disciplinary action may include:

Disciplinary conversation: A disciplinary hearing shall take place if Kids of Uganda's has been made aware that events that are not considered crimes, but which nevertheless violate this policy, the organization's values, good business practice, or can otherwise be perceived as unacceptable action by one of the organization's members.

Disciplinary action: This can be a case of suspension, dismissal or loss of a position of trust, or a change in the job description / division of responsibilities in the organization.

Exclusion from membership is stated in the Kids of Uganda's statute.

Report to the police: If the board is of the opinion that there is a criminal suspicion, a police report is drawn up in the country where the crime has been committed.