



ANTI-FRAUD POLICY

APRIL 2019

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POLICY STATEMENT

This document sets out the policy and procedures of ACAL against fraud and other forms of dishonesty.

It applies to Directors, staff, associate consultants, interns, sub-contractors or anybody associated with ACAL who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

STATEMENT OF INTENT

ACAL will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All staff members and associates of ACAL have a responsibility for putting these principles into practice and for reporting any breaches they discover.



DEFINITIONS

Fraud: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either; a member of the public, someone who works for ACAL. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud

Theft: Dishonestly acquiring, using or disposing of physical or intellectual property belonging ACAL or to individual members of the organisation.

Misuse of equipment: Deliberately misusing materials or equipment belonging to ACAL for financial or material benefit.

Abuse of position: Exploiting a position of trust within the organisation for financial or material benefit.

CULTURE

ACAL fosters honesty and integrity in its entire staff. Directors, staff and Associates are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations such as suppliers are expected to act with integrity and without intent to commit fraud against the Company.

As part of this ACAL will make aware by which concerns may be raised by Directors, staff and Associates.

Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice

RESPONSIBILITIES

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

THE BOD

The Board of Directors are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Company's policies, aims and objectives.

The system of internal control is designed to respond to and manage the whole range of risks which the Company faces.

The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks. The Director of Finance while carrying out risk assessments shall consider fraud, corruption and bribery

THE CEO

Overall responsibility for managing the risk of fraud has been delegated to the CEO. The day to day responsibility has been delegated to the Country Director to act on behalf of the CEO. Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- Establishing level of fraud risk and mitigations.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for: Reporting fraud risk issues; and reporting significant incidents of fraud or attempted fraud to the Board of Director Directors;
- Making sure that all staff are aware of the Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud briefing is made available to Directors, staff and associates as required; and
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

SR MANAGEMENT TEAM

The Senior Management Team is responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud as far as possible;
- Assessing the types of risk involved in the operations for which they are responsible;
- Reviewing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their systems continue to operate effectively;
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

STAFF

Every member of staff is responsible for:

- Acting with propriety in the use of ACAL`s resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

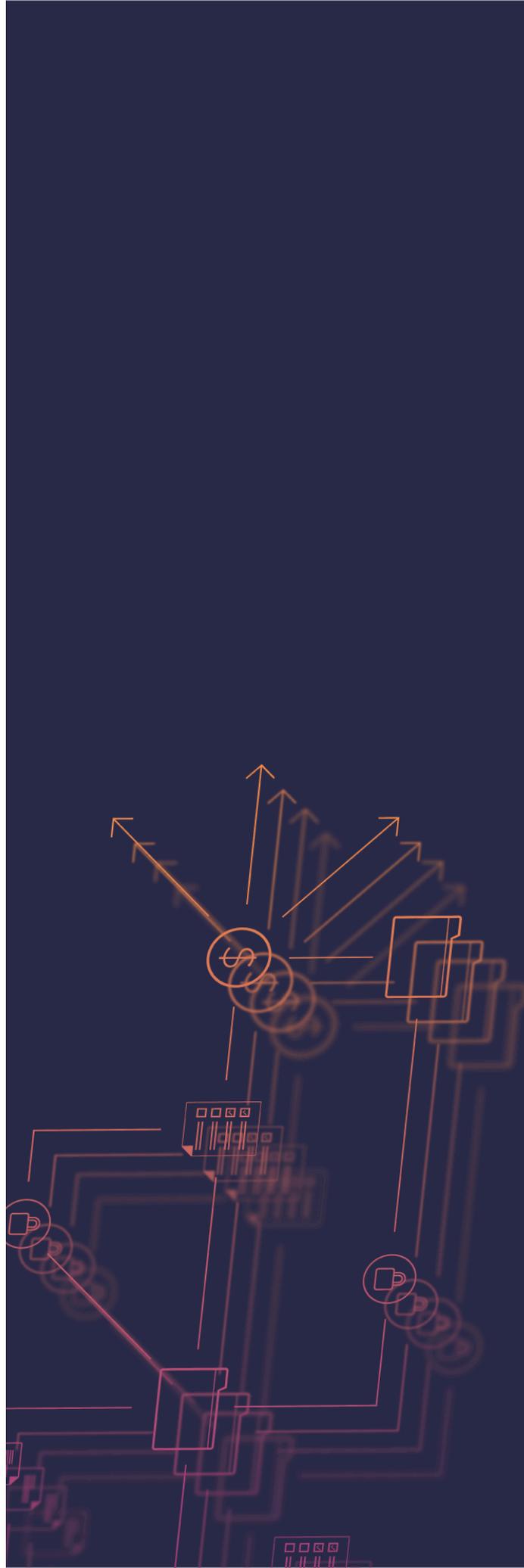
ASSOCIATES

Every Associate is responsible for:

- Acting with propriety in the use of the ACAL's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their immediate manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

REVIEW

This policy will be reviewed on an annual basis to ensure continuing suitability.





About ACAL

We go deep to unlock insight and have the courage to act. We bring the right people together to challenge established thinking and drive transformation. We work with our clients to build the capabilities that enable organizations to achieve sustainable advantage. We are shaping the future. Together. See how we change the game at acalconsulting.co.ke

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