



Anti- Corruption & Anti-Fraud Policy

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ACRONYMS AND ABBREVIATIONS

EC	Executive Committee
NCC	National Conservancies Council
WWCA	Western Wildlife Conservancies Association
FKE	Federation of Kenya Employers
KPIs	Key Performance Indicators
HR	Human Resource
CEO	Chief Executive Officer
ICT	Information Communication Technology
UN	United Nations

1.0 ABOUT WWCA

Wenya Wildlife Conservancies Association (WWCA)

The Western Wildlife Conservancies Association (WWCA) is the national representative body and voice for conservancies in Western Kenya. Our role is to help catalyse the conservancy movement by connecting, informing, convening and representing conservancies and other key stakeholders in a shared effort to make wildlife conservancies thrive in Western Kenya.

Our Mission: To build and promote wildlife conservation in an efficient, reliable, effective safe and environmentally friendly through enhanced conservation mouth piece for socioeconomic development besides, application of innovative best practices in the region.

Our Plan: Communities derive multiple benefits from the management of land and natural resources under sustainable wildlife conservancies

Our Long-Term Vision: To be a leading association in Kenya that promotes peaceful co-existence, a secure environment and development for sustainable livelihoods in Western Landscapes.

Value Proposition

We draw our mandate from the wide membership of grass root communities and private landowners with the influence to determine the future of wildlife outside national parks and reserves. We are the central hub for information gathering and sharing on conservancies. Because of this, we hold the unique position to connect national and international actors to local-level conservancies and vice versa. These connections – from funding opportunities to technical support to investor interests to policy demands – are making the conservancy landscape much richer and stronger as a whole.

Our core values;

Commitment: Dedication to the preservation and protection of wildlife and natural habitats. Implementing best practices in wildlife management and habitat restoration.

Community Engagement: Involving local communities in conservation efforts and decision-making processes.

Enhancing livelihoods through education, training, and sustainable development programs.

Collaboration: Building strong partnerships with government agencies, NGOs, local communities, and the private sector. Creating a platform for sharing ideas, resources, and best practices

Partnerships: We recognise the value of strong long-term partnerships to accomplish our goals.

Our Approach

Convene: We bring key stakeholders together to ensure inclusive and informed processes, decisions and actions.

Connect: We link key stakeholders, partners and supporters together in an effort to build stronger, more effective conservancies.

Inform: We collect and distribute information about and for conservancies in order to positively influence decisions, policies and practices.

Represent: We serve as the voice of conservancies and ensure their interests, needs and stories are heard by key decision makers and other stakeholders.

2.0 WWCA POSITION ON CORRUPTION AND FRAUD (-Policy statement)

2.1 Policy Statement

WWCA seeks to take a leading role in management of corruption and fraud by developing a policy framework to guide and direct the dealings of the organization, both internally and externally. This policy is anchored by WWCA mission, vision and values and is in tandem with the expectations and baselines set by the statutes of the Government of Kenya in the management of corruption and fraud in the society.

WWCA is conscious of the risks and threats of corruption and fraud in its day to day operations, management of its programs and achievement of its strategic growth; WWCA recognises that corruption and fraud have detrimental impacts to the organisation's stability, and if not systematically managed, they may undermine the goal and mission of the organisation, harm its reputation and financial viability; WWCA also recognises that corruption and fraud are key drivers of biodiversity loss, environmental degradation, poverty, conflicts, bad governance, increase costs of basic public services, and undermine attainment of national and global sustainable development goals.

WWCA is committed to;

-  Acting professionally and fairly in all of its operations and relationships, employing the highest standards of openness, transparency and accountability.
-  Takes a zero-tolerance approach to fraud and corruption.
-  WWCA is committed to the deterrence, management, and fight of corruption and fraud practices as they are anti-ethical to the organisation's core values of integrity and accountability;
-  WWCA promotes a culture of honesty and integrity, and totally opposes any form of fraud or corruption.

-  WWCA expects all its stakeholders to strive to close and eliminate all avenues of corruption and fraud in order to make WWCA a corruption and fraud free member organization.

-  Ignorance of this policy shall not be an excuse for failure to act upon any matter or comply with the policy.

2.2 Purpose of the policy

WWCA's Anti-corruption and Anti-fraud Policy establishes framework to govern corruption and fraud prevention, detection, reporting and responses. The policy sets out responsibilities of WWCA, its conservancy membership, governing body comprised of National Conservancy Council (NCC) and Executive Committee (EC), and the secretariat, to adhere to and uphold the organization's position on fraud and corruption.

-  The Policy strengthens WWCA's internal controls, cultivates productivity and promotes good governance. The Policy further:

-  Provides clarity and defines what entails corruption and fraud, therefore raising awareness and instills cultures of consciousness to corruption and fraud risks or activities;

-  Outlines the standards expected of WWCA's staff, NCC, EC, members, in dealing or relating internally or externally with stakeholders and partners in manner that upholds the organization's values under this Policy;

-  Communicates policies and procedures to guide in corruption prevention, detection and response Provides framework for conformity with national policies, laws and regulations

and Internationally recognized principles on corruption; and



Promotes anti-corruption and anti-fraud culture and practices among its conservancy membership and landscape conservancies associations.

3.0 SCOPE OF POLICY



This policy applies to all individuals working for and with WWCA including the conservancy members, NCC, EC, employees (whether temporal or full-time), interns, attachés and any third party working on the behalf of the association.



The policy shall cover both internal and external forms of corruption and fraud as far as WWCA is concerned. The policy is however, not intended to describe the full range of corrupt or fraudulent activities and recognizes that corruption and fraud evolve and manifest in different ways.



The policy shall be read and implemented together with other WWCA policy documents that give guidelines on internal procedures, processes and internal controls.



These include policies on finance, procurement, human resource, assets management, risk management, information technology and communications, and any other policy that maybe adopted by WWCA.

WWCA's Anti-corruption and Anti-fraud Policy aligns to the national policies, laws and regulations on Corruption,

including the Constitution of Kenya 2010– Chapter six on leadership and integrity, and the Anti-Corruption and Economic Crime Act of 2003. The Policy also endeavors to measure up with Article 1 of United Nations Convention against Corruption, which Kenya is a signatory to, specifically Article 1 that sets out its purpose to;

- a] To promote and strengthen measures to prevent and combat corruption more efficiently and effectively;
- b] To promote, facilitate and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery;
- c] To promote integrity, accountability and proper management of public affairs and public property.'

This Policy shall be read and applied in conjunction with the other WWCA policies including the human resource, financial management, procurement, assets management, Information-communication and technology and risk management.

4.0 DEFINITION OF KEY TERMS FOR PURPOSE OF THE POLICY

4.1 Corruption

In the absence of a universally accepted definition, this policy recognizes corruption to involve act of dishonestly or illegally obtaining an advantage from a third party by abusing an entrusted power for private gain. It involves offering, giving, receiving, or soliciting anything of value to improperly influence the actions of another party either directly or indirectly.

WWCA adopts a range of acts and omissions to constitute corruption, as guided by the Anti-Corruption and Economic Crimes Act 2003. These include:

- 1) Abuse of position or office, for personal gain or for the advantage of another person.
- 2) Bribery.
- 3) Theft.
- 4) Embezzlement or misappropriation of funds.
- 5) Fraud.
- 6) Evasion of payment of Government revenues, taxes, rates, fees and other dues.
- 7) Failure to report corruption.
- 8) Apathy towards corruption.
- 9) Bid rigging.
- 10) Improper offer, receiving or soliciting of benefits for appointment of employment or consultancies.
- 11) Secret inducement or awards for advice.

them or induce others to do so by misusing the position in which they are placed.

4.1.1 Corrupt Practice

This is a behavior on the part of an official in the organization whereby they improperly and unlawfully enrich themselves and /or those close to

4.2 Fraud

This Policy recognizes fraud as use of deception with the intention of pursuing or obtaining personal or private interests or advantage for one self or on behalf of third parties at the expense or loss of the WWCA, or to avoid an obligation. Acts of deception involve cheating, dishonesty, tricking or pretending to be someone else. Fraudulent conducts include but not limited to:

- Misappropriation of assets.
- Embezzlement and theft.
- Receiving a private gain in return for favoring a candidate in a recruitment process.
- Participation in sham transactions.
- Making false or deceptive statements or misrepresentations.

- Concealment of material facts.
- Extortion.
- Bribery.
- Forgery or alteration of accounting records or vouchers.
- Falsely claiming overtime, medical expenses, travel/subsistence allowance, or sick leave; and
- Collusion.

4.2.1 Fraudulent Practice

This is an act or omission including a misrepresentation that knowingly or recklessly misleads or attempts to mislead a party to obtain a financial or other benefit or to avoid an obligation. This policy recognizes this practice as fraud.

4.3 Bribery

This Policy recognizes bribe as the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out any WWCA activities.

Facilitation payment – Also known as “grease payment” is a sum paid to an organization official in order to expedite routine or non– discretionary activities. The policy recognizes facilitation payment ‘grease payment’ as a form of bribery.

4.4 Conflict of Interest

This policy recognizes Conflict of interest as the direct or indirect private interest by an employee, NCC or EC member in a decision or process of the organization and subsequent failure to disclose the interest for personal gain. The impartiality of an employee, NCC or EC member in discharging respective duties and responsibilities could be called into question because of the potential, perceived or actual improper and impermissible influence of personal considerations, financial or other forms.

Note: The three words: corruption, fraud and bribery are intertwined and for the purpose of this policy all the three words shall be mentioned and referred.

5.0 CORPORATE GOVERNANCE OF THE POLICY

5.1 The National Conservancies Council (NCC)

The NCC of WWCA, shall have the sole mandate of providing strategic direction on oversight, execution and audit of this policy, through its finance and audit committee. NCC may incorporate the CEO in its processes on need basis. NCC shall exercise duty of care in the execution of its roles and responsibilities which include:

- Demonstrate high level of commitment to zero tolerance policy on fraud and corruption of any nature.
- Ensure adequate resources allocation to facilitate management, execution, audit, training, evaluation and monitoring of this Policy.
- Form and promote strong foundation of collective action.
- Nominate external auditors as required in WWCA Constitution and propose to the annual general meeting for endorsement.
- Make fair resolutions on matters addressed to it regarding alleged corruption and fraud.
- Further NCC shall receive reports from the EC and CEO for review and consideration to aid any strategy direction considerations.

5.2 The Executive Committee (EC)

The EC shall have overall responsibility of providing oversight of this policy. The overall oversight responsibility of the EC shall include:

- Monitor and evaluate the implementation of this Policy.
- Ensure fair and equitable practices in administering discipline to related cases and cooperate with the law enforcement where necessary.

- Recommend for investigation and appropriate response and management mechanism to alleged corrupt or fraud activities, within the EC's mandate.

5.3 The CEO

The CEO is responsible for ensuring the execution of this policy and associated controls, processes and procedures. Specifically, the CEO, shall:

- Put in place effective control systems to prevent, detect, effectively manage and resolve incidences of corruption and fraud and any other serious malpractices.
- Effectively communicate WWCA standards and policy on zero tolerance to corruption and fraud and promote within WWCA and externally to agents, partners, contractors and suppliers.
- Promote ethical standards among the employees.
- Encourage a culture of identifying and reporting suspected corrupt and or fraudulent acts or non-compliance to this policy.

- Ensure compliance of the Policy by the employees in all operations and programs performance.

- Integrate corruption risk management policy and strategies within operational instruments of the organization including employment agreements, contractual agreements and other policies and processes of WWCA.

- Demonstrate that corruption and fraud is unacceptable and not tolerated through deed, action and management.

- Receive feedback from staff, internal auditors, external auditors and other assurance providers

that corruption and fraud management policy and strategies are effective.

 Develop and promote implementation of robust procedure and internal control practices, and reporting processes and procedures.

-  Promote and ensure adequate allocation of resources to support the implementation of this Policy.
-  Mitigate the impact of any possible gaps within the organization that may arise from time to time and pose as corruption or fraud risk as a continuous improvement practice.
-  Authorize investigations as well as disciplinary or corrective action as required, with his/her mandate.
-  Communicate to the EC of any acts or suspected acts of corruption or fraud within the organization, which may have significant impact to the organization's strategic development, membership, reputation, and relationship with key partners.
-  Communicate with EC on effectiveness, success and challenges of this Policy and recommend any necessary amendments of the Policy.

5.4 The Staff

-  Familiarize with this policy and its application within their areas of responsibility.
-  Comply with all areas of this policy and applicable laws, and regulations.
-  Be conscious and alert to the possibility that corruption and fraud may occur in their area of responsibility, and support CEO in identifying possible areas and development of effective mitigation strategies.
-  Execute strategies developed to mitigate corruption and fraud.
-  Provide feedback on the effectiveness of this policy and any corruption and fraud mitigation strategies adopted and implemented.

-  Report on all cases or suspicion of corruption and fraud that come to their attention.

5.5 Conservancy Members & Stakeholders

5.5.1 All WWCA conservancy members and agents,

All WWCA conservancy members and landscape conservancy associations are obligated to interact with WWCA in an honest, ethical and legitimate manner, report allegations of corruption and fraud to WWCA and promote adoption of anti-corruption and anti-fraud policies in their respective conservancies and landscape associations.

5.5.2 All WWCA other stakeholders

All WWCA agents, suppliers, contractors, partners and the general public are obligated to interact with WWCA in an honest, ethical and legitimate manner, report allegations of corruption and fraud to WWCA and comply with this policy and relevant laws.

5.6 Corporate Responsibility

-  WWCA shall have collective responsibility to ensure successful observance and compliance of this policy. The Policy shall be embedded within the organization's culture and underpinned by its mandate, mission, vision and values.
-  WWCA management commits to sharing information, strengthen processes and accountability at all levels and take collective action to prevent bribery, corruption and fraud.
-  WWCA management shall commit to have periodic audits by competent auditors.

6.0 CORRUPTION AND FRAUD RED FLAG AREAS

WWCA recognizes that all its programs and operations functions and processes create potential avenues or appetite for corruption and fraud. This policy prohibits any employee, intern, attaché, NCC or EC member, conservancy member, or other person duly authorized to deal or act on behalf of WWCA to engage in aiding the success of any of the following, incidences and any other that may be of such nature that may be classified as fraudulent, corrupt or otherwise.

 Staff administration–falsifying leave administration, medical covers administration, payroll, training and development opportunities for personal benefit.

6.1 Functional Areas

-  Financial and accounting – flouting accounting standards.
-  Planning and management –flouting procurement process and assets management.
-  Information technology and communications – dataand systems fraud.
-  Public relations – canvassing to save organizational or individual image.
-  Internal audit – departmental team culture of hiding crucial information to auditors or critical stakeholders to avoid process monitoring.
-  Grants management– Misuse, kickbacks e.tc.

6.2 Administrative Areas

-  Hiring processes – e.g. a job applicant canvassing the recruitment process to increase the chances ofbeing hired.
-  Records Management –e.g.an employee falsifying accounting documents on travel, meetings, service delivery, etc, to obtain money or hiding of proof documents to conceal fraud.

6.3 Extension Services

-  Grants management – e.g. withholding grant to influence decision or control outcomes.
-  Government Services – e.g. a government official prompting for a bribe to facilitate government services e.g. conservancies registration, provision of compliance certificates, among others.
-  Research and Development – Influence conservancies to manipulate figures or facts,
-  Policy interactions –offering bribes to influence inclusion of WWCA and conservancies in government policy processes and taskforces.
-  Community outreach programs – soliciting bribes from conservancy members or seeking personal favors as conditions to involve them in WWCA programs or services.
-  Administration of Voluntary corporate contributions, sponsorships and charitable

donations– soliciting kickbacks, making contributions in areas or conservancies that will advance private gains or interests rather than intended beneficiaries.

An elaborate list of causes and appetite that enhance corruption and fraud have been inserted in appendix 2.

6.4 Conflict of Interest

-  WWCA shall have a zero tolerance to behaviors and actions that fuel conflict of interest
-  WWCA aligns to the principles of leadership and integrity provided by the Constitution of Kenya 2010 (Chapter 6), which creates obligation on declaration of personal conflict that may conflict with public duty.
-  The NCC shall specifically through its fiduciary duties and duty of care and loyalty to WWCA, institute and uphold the necessary measures to provide concrete oversight on issues of conflict of interest, bribery, corruption, fraud and any other

serious malpractice that may undermine this policy and the credibility of the organization.

- WWCA shall build on the broad intent and purposes of this policy to build trust and honesty among stakeholders. An important element of trust and integrity and in line with WWCA's core values shall be to ensure that the organization and its representatives conducts its affairs in accordance with the organization's values and the commitment to adopt zero malpractices that would hinder its mandate.
- WWCA shall ensure all its policies, standards and procedures in the organization are maintained active, and operational effectiveness, both operationally and administratively, with a view of taking all possible steps to prevent conflict of interest to safe guard both the organization and its stakeholders.
- All WWCA internal controls and procedures shall impose restrictions as appropriate to conflict of interest. The management shall make every effort to ensure that all persons have limited individual discretionary decision making/ discretionary powers, irrespective of the position held in the organization.
- When arrangements are deemed insufficient and gaps are identified, every effort shall be made to remedy the gaps through continuous improvement process. Such gaps shall be identified by taking into consideration;
 - Any data provided in the conflict of interest declaration form.

- a) Frequency of arising gaps, as reported by whistleblowing, monitoring and evaluation and collective accountability metrics.
- b) Managerial systematic analysis of recurring mild incidences that point to an underlying issue that require attention.
- c) Gaps in other policies that conflict with the expectation of this policy, with a view to harmonize.
- d) Critical incidences arising from serious malpractices within the organization.
- e) All persons affiliated with WWCA that fall within the scope of those covered by this policy shall declare any existing conflict of interest (Appendix 3 of this Policy) in the execution of their duties and responsibilities as well as relating with the organization in any manner to which conflict of interest may arise.

6.5 Serious Malpractices

This policy explicitly considers serious malpractices as counterproductive to the intents and purposes of this policy. All action of bribery, facilitation payments 'grease payment' fraudulent practices, corruption including all actions referenced in this policy that the policy undertakes to take zero tolerance on shall constitute serious malpractice. WWCA shall consider such as an improper behavior being committed or likely to be committed to undermine the organizational efforts to the management of corruption and fraud.

7.0 PERMISSIBLE VS. PROHIBITED PAYMENT

7.1 Permissible Payments

WWCA permits payments made to or for the benefit of service providers, public officers or partners, if ONLY they are for a legitimate purpose and consistent with relevant national laws on corruption. This policy recognizes the following nature of payments as permissible.

- Levies and fees that apply to the existence of WWCA for purposes of meeting its registration mandate accompanied by the relevant accounting documents and appropriate approval processes.

- Government levies that are within the levy provisions and taxation laws accompanied by the relevant accounting documents and appropriate approval processes.

- Payment for goods and services procured through the laid down procurement procedures and accompanied by the relevant accounting documents and appropriate approval processes.

- Payment of goods and services that is contractual in nature, the contract awarding having met the set procurement policies and procedures. Where a contract is awarded with consideration to a tendering process or on managerial decision in consideration of highly technical and commercial competence of the supplier, such should administratively be captured through a business case vide the CEO to the NCC or EC for approval prior to engagement. Further, accounting processes and approval procedures should be adhered to.

- Payments to partners in line with partnership deeds and commitments should be accompanied by the appropriate documentations of partnership deeds, accounting documents and within appropriate approval processes.

- Contributions to any cause of conservation in nature, that has a positive impact to WWCA efforts and conservancy members, and that which WWCA

failure to participate may dent its partnerships, relations or reputation. The CEO may present a case for consideration and approval by the NCC or EC, of such contributions. The consultative process may qualify and quantify the payment. Once the NCC approval is granted, the Officer in charge of Accounting shall pass the payment through the normal accounting processes and payment procedures. Internally, as a precautionary measure, the internal controls processes and procedure shall explicitly define the number of such contributions to set permissible limits.

7.2 Prohibited Payments

WWCA recognizes prohibited payments to include any kind of payment that may not fall under the permissible payments under this Policy, and or is made to influence a decision of service providers,

public officers or partners in the form of kickbacks or bribes.

Further, this policy does not recognize payments for political contributions and Harambees. WWCA as an organization is not affiliated to any political outfit.

WWCA shall recognize further prohibited payment to activities or institutions that are deemed to advance activities that are of serious crimes against humanity and are among and not limited to; terrorism, money laundering, gaming and betting, human trafficking, child trafficking and child abuse of any nature, drugs trafficking and /or sexual related crimes.

WWCA shall recognize further prohibited payment to activities or institutions that are deemed to advance activities that are of serious crimes against animals and environmental degradation and are among and not limited to; illegal wildlife trade, trophy gaming, authorized deforestation and any form of wildlife and environmental related crimes.

8.0 STRUCTURE TO PREVENT, MITIGATE & MANAGE CORRUPTION AND FRAUD

WWCA shall adopt internal control measures to prevent corruption and fraud, including, but not limited to:

8.1 Detection

WWCA shall always endeavor to early detect possible risks of corruption through various measures including:

8.1.1 Internal and External Audit

WWCA's internal audit function shall be carried out by the finance and oversight committee of NCC. The internal audit function shall be designed and carried out in a way that allows detection, monitoring and evaluation of potential corruption, establish effectiveness, challenges and lessons from existing corruption risk management strategies implemented by WWCA. Internal audit shall compliment management's role of preventing, monitoring, detecting and reporting on corruption.

WWCA shall endeavor to undertake annual externally and independently managed audit, in accordance with its Constitution and other relevant policies and standards adopted. External audit shall serve an effective role in detecting and assessing corruption and fraud risk within the functions and operations areas of the organization.

8.2 Due Diligence

WWCA shall undertake due diligence within appropriate time, on prospective contractors, service providers and project partners to prevent engagement with entities that have questionable or disreputable record or reputation. The level of due diligence shall be guided by the perceived risk

impact. Potential new partners, contractors or service providers shall require higher degree of due diligence carried out.

WWCA shall develop the key areas and tools that facilitate due diligence, in line with other operational policies including on finance and procurement to determine whether the potential partner, contractor or service provider have the following:

8.3 Written Agreements/Contracts

- Qualified and appropriately licensed to conduct the particular business.
- Successful and reputable track record.
- Conflict of interest with the engagement in question.
- Capacity to deliver the particular engagement (skills, knowledge, resources, and experience).
- Capable or willing to comply with the relevant policies of WWCA.
- Adopted appropriate policies to prevent corruption and fraud.
- Has not engaged in activities that are against WWCA's mission, values and policies on terrorism, illegal wildlife trade or other wildlife crimes, money laundering, human trafficking, drugs trafficking or sexual related crimes.

WWCA shall include provisions on anti-corruption and anti-fraud in all its agreements with partners, contractors and service providers, to protect the organization and prevent corrupt and fraudulent activities. The agreements shall also include:

- A representation and warranty that the partner, contractor or service provider is aware of the requirement of compliance with this policy and applicable laws and regulations.
- A requirement the partner, contractor or service provider shall submit original copies of any required financial receipts.
- A right for WWCA to withdraw and terminate contract or agreement, in the event that the partner, contractor or service provider violates such representation or warranties.

8.4 Accurate Record Keeping and Payment Procedures

WWCA shall make and maintain proper books, records and accounts, which accurately reflect transactions, including expenditures, justifications for expenditures and all evidence of transactions including invoices and receipts of payments. WWCA shall maintain internal accounting systems and standards in accordance with accepted accounting principles that enable assurance of transactions. All accounting processes shall be in linewith the Finance policy provisions.

8.5 Whistleblowing

WWCA adopts a non–reprisal approach to persons who discover and report any corruption and fraud practices. The identity of such persons shall be concealed, unless where necessary, or consent is given by the person making the disclosure or by provision or operation by law.

I. Reporting measures for Whistleblowing

The reporting measures to be embraced and maintained to facilitate whistle blowing include:

 **Open reporting** — scenario where the person reporting is known and does not wish to hideidentity.

 **Confidential reporting** – scenario where the person reporting wishes to remain anonymous forwhatever reason.

 **Anonymous reporting** —scenario where the person reporting is unknown and does not wish tobe known.

II. Administration and Management of Information from Whistleblowing

 The CEO shall be open to receive confidential reports and ensure that the persons who

whistle blow are not disclosed or victimized. Where witness protection is required, the provisions of Witness Protection Act 2006 on witness protection shall be evoked.

 All confidential reports received shall be written and countersigned by CEO, where the person reporting does it verbally. Information obtained shall be managed in a confidential manner.

-  Where the office of the CEO is culpable, the reporting shall be made directly either to the EC or NCC.
-  The CEO, EC and NCC, as the case may be, shall always ensure that the persons who whistle blow are not victimized or disclosed, and ensure that the process of investigation is inclusive of all proof thereof.
-  All evidence provided or obtained from the whistle blowing report shall be reviewed during investigation, and reports compiled and serialized to ensure any gap is promptly noticed.
-  Investigations on any complaint or alleged corruption or fraud shall be carried out in line within the relevant laws. WWCA shall seek necessary professional expertise to support the investigations, if need arises.
-  The subject or focus person in any investigation may be allowed to be accompanied by a fellow colleague of their choice if they deem so during investigations or questioning.

-  All communications to all parties involved in the investigations shall be made in a clear and effective means.
-  Principle of fair justice shall be availed to all parties involved in the investigation, where the subject shall be allowed to respond to the accusation or complaint.
-  The documents of evidence, testimonials, forensic evidence, data of any nature related to the investigation activities shall be filed and maintained under custody of the CEO or EC or NCC, depending on the nature and gravity of the case.
-  The parties involved in the investigation have the right to be informed on the outcome of the investigations and the next course procedure thereafter.

///. Handling Outcomes of Investigation from Whistleblowing

WWCA CEO or NCC or EC shall make decision on how to handle reports from investigations that demonstrate that the accused or suspected person. Among the decisions to be made include:

-  Refer the matter for disciplinary management as guided by the human resource policy and labor legislations and guidelines. The disciplinary process as per the WWCA HR policy should be instituted as the first management action. However, WWCA should weigh the extent of the case, and if criminal in nature, the criminal justice process should be pursued.
-  Refer the matter to the police for criminal procedure and prosecution.
-  Refer the matter to the anti- corruption body for further processing.
-  WWCA shall assume corporate responsibility when acts of corruption and fraud occur or are confirmed. This will include design and implementation of additional policies and processes aimed at systems improvement to avoid recurrence if the incidence is within their area of control.
-  Promoting transparency and compliance in a continuous improvement process.
-  Placement of a suggestion box or corruption/fraud reporting box within the WWCA premises for safe depositing and institute a confidential retrieval method.
-  Provide resources for an interactive online and physical platform that all stakeholders may engage into.
-  Provide a safe and secure hotline phone number accessible to stakeholders.
-  Train all NCC and EC members and staff on this policy.
-  Deal decisively with malicious reporting that is baseless to discourage tarnishing of each other or the institution.
-  Authenticate any kind of reporting of any nature.
-  Deliberately partner with relevant partners to systematically and collectively deal with any unethical behaviors.

8.6 Management Initiatives to Encourage Detection and Whistle blowing

WWCA commits to support initiatives that encourage detection and information sharing on corruption, fraud and issues surrounding unethical behaviors, through the following:

9.0 TRAINING & DEVELOPMENT

WWCA shall train all its NCC and EC members and employees on this policy and its implication. WWCA shall ensure that:

- i) The NCC and EC receive adequate training and awareness on this Policy to enable them take ownership and undertake their oversight responsibility. The EC shall sign a code of commitment of ownership and oversight responsibility of this policy.
- ii) All employees including those newly hired have access to this Policy and are trained and regularly updated, to enable effective compliance. The employees shall sign a training confirmation form, which shall be maintained in the respective employee files.
- iii) Key stakeholders including partners, contractors, and service providers are informed of this Policy.
- iv) Appropriate communication structures and processes are established and maintained.
- v) Adequate resources are available to comply with this Policy.
- vi) Technical assistance is sought in training, capacity building or compliance of this Policy if the need is established.

10.0 MONITORING & EVALUATION

WWCA commits to maintain a robust monitoring and evaluation framework to ensure there is accountability. The monitoring shall enable realize the following:

- i) Strengthen implementation capacity.
- ii) Improve awareness.
- iii) Assess emerging issues and respond to them proactively.
- iv) Improve coordination and communication through data and available information.

10.1 Monitoring & Reporting Framework

WWCA commits to adopt the following key internal monitoring activities:

- i) Internal audits**—this shall be carried as detailed in chapter 8 of this policy.
- ii) Risk assessment**— WWCA shall from time to time reflect on its organizational risk register to correlate areas that require appropriate managerial preventative measures to corruption and fraud.
- iii) Reporting** – WWCA shall use all the tools and modes available including ICT to report appropriately. The management shall engage in reporting within standard operating procedures. Various modes of reporting shall be used including, regular reports, meetings, presentations, seminars, publications on the website or portal, press release where necessary, donor briefings, focused reporting where necessary, stakeholder reports, and workshops among others.

11.0 REVIEW OF THE POLICY

WWCA commits to review this policy within the most reasonable time to respond to any emerging issues that may arise and are critical to this policy. Changes in legislations that inform and have a direct impact to this policy shall form the basis of review of the policy. In best practice, where no major incidences occur, WWCA shall endeavor to conduct the policy risks to review every three years.

Signed by

Chairperson

For and on behalf of

Date.....

Western Wildlife Conservancies Association

In the Presence of

Chief Executive Officer

Date.....

APPENDIX 1

DOs & DON'Ts List – Policy Expectations.

POLICY AREA		DOs	DON'Ts
Policy Mandate	Finding the place of the policy in the institution and adaptability.	Deliberately take a collective responsibility to accommodate the policy.	Leave it to choice.
Corruption detection and management	<ul style="list-style-type: none"> Addressing the matters concerning corruption and fraud. Whistle blowing Audits Other detection methods 	<ul style="list-style-type: none"> Deal with matters when hot, when matters linger, they form organizational culture direction. Ensure reprisal is prevented at all cost and support those that may express fear. Encourage communication and commitment to the cause. Support investigations fully. 	<ul style="list-style-type: none"> Condone corruption and fraud. Fail to revoke appropriate procedures as per provisions of the document. Don't obstruct justice. Discourage participants.
Donations		As guided by HR Policy	Encourage
Payments	Permissible	Refer to section 8.1	Overlook procedures and processes
	Prohibited	Refer to section 8.2	Overlook procedures and processes
Omissions and emerging issues.	Managerial actions required	<ul style="list-style-type: none"> Leadership direction within the policy principals. Consider inclusion during document review 	Fail to institute consultative approach.
Monitoring and evaluation	Provide work plans	<ul style="list-style-type: none"> Improvise if this is a complex undertaking for staff. Train and empower 	<ul style="list-style-type: none"> Fail to evaluate the KPIs and outcomes. Conceal mistakes Fail to give feedback.
Policy	Risks in implementation	<ul style="list-style-type: none"> Anchor it on Governance - Leadership guidance and oversight. Transparency Accountability Uphold values 	Fail to address emerging risks within the foundations of the document.

APPENDIX TWO

APPETITE & CAUSES OF CORRUPTION AND FRAUD

CAUSES	<ul style="list-style-type: none">• Weak / poor corporate governance.• Uncontrollable greed.• Management practices that send mixed signals to employees, partners and stakeholders.• Weak control processes and procedures.• Attitudes that are none committal to zero tolerance to fraud, bribery and corruption.• Unclear risk management practices.• Deliberate breaking of rules and procedures with no managerial actions taken.• Procurement practices not anchored on policy.• Weak Human Resource Policies or breach of policy – for example hiring of employees without regards to guiding policies.• Management silence on known conflict of interests or bribery cases within the organization.• Lack of clear guidelines on receiving or offering gifts and donations of any nature.• Lack of monitoring and evaluation through periodic audits.• Disregard of professional ethics.• Lack of checks, balances and control mechanisms• Tribalism, nepotism and ethnicity.• Erosion and distortion of values.• Unfettered discretionary powers.
APPETITES	<ul style="list-style-type: none">• Greed is the common denominator appetite for corruption.• Appetite to disregard rules and regulations.• Appetite for gifts, handouts and donations.

APPENDIX THREE

CONFLICT OF INTEREST DECLARATION FORM

Part A – Declaration by all staff

I hereby undertake to declare to my supervisor and the office of ethics and integrity when a situation arises where I have interest or where a relationship of which I am aware conflicts or may reasonably be thought to conflict with WWCA or public duty, whether that interest is financial or otherwise.

I do affirm that the information contained in this declaration is true and complete.

I would like to report the following existing/potential conflict of interest situation arising during the discharge of my official duties:

Persons/companies/ with whom/which I have official dealings and or personal interest

- 1.
- 2.
- 3.

Brief description of my duties which involve the persons/companies mentioned above

.....
.....

Areas of real/possible conflict of interest:

- 1.
- 2.
- 3.

Date:

Name of declaring staff

Designation:

Staff No

Staff signature:

Part B – Acknowledgement (to be completed by the approving authority)

To:

(Declaring staff)

The information contained in your declaration for..... is noted. It has been decided that: *(Tick as appropriate)*

You should refrain from performing or getting involved in performing the work as described in Part A, which may give rise to conflict of interest.

You should continue to handle the work as described in Part A, provided that there is no change in the information declared above.

Other conditions given: (please specify)

.....
.....

Date.....

Name.....

Title

Signature:

