



Restoring Dignity, Inspiring Change.

Anti-Fraud & Bribery Policy

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PART I

1 Scope of this Policy

- 1.1 This policy applies to all relevant persons of ICMC. Relevant persons include staff, Governing Committee members, consultants, volunteers, and short-term contractors. ICMC is a Catholic-inspired organization working with and on behalf of uprooted and migrant populations including refugees, asylum seekers, internally displaced people, victims of human trafficking and migrants, the International Catholic Migration Commission (ICMC) is committed to hold itself accountable to all those it partners with and serves.
- 1.2 Part I includes sections that are useful for and made available to all relevant persons and are publicly available on ICMC's website.
- 1.3 Part II includes sections that are used for the members of ICMC governance bodies (Council and Governing Committee), Secretary General and management officials in Headquarters, and all Field and Liaison Office and other ICMC programmes, for appropriate and effective responses and actions related to allegations, and efforts to prevent any occurrence of fraud and to build an anti-fraud culture within the organisation.

2 Definitions of Corruption, Fraud, and Bribery

- 2.1 Definitions of corruption, fraud, and bribery are found in Appendix I.
- 2.2 It also will be considered "bribery" to make unofficial payments (known as 'grease' or 'facilitation' payments) to a public official to secure or speed up a routine action to which you may feel entitled to. For example, you pay a public official a small "fee" to speed up the issuing of a visa.
- 2.3 Some examples of fraud and bribery that might be relevant to ICMC activities are described in Appendix II.

3 Zero Tolerance on Fraud or Bribery

- 3.1 ICMC's position on fraud and bribery is to take a zero-tolerance approach, and we are committed to pursuing this approach throughout its operational practices for the following reasons:

- ICMC recognises the significant risk that fraud and bribery pose to achieving its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to accomplish our mission.
- Corrupt behaviour also seriously damages our reputation. The eradication of fraud and bribery in the way we operate is greatly important to securing our stakeholders' trust and confidence.
- ICMC has an obligation to its national member Episcopal Conferences, beneficiaries, funders, and partner organisations to prevent fraud or bribery. Corruption creates unstable societies. It destroys public and business standards and forces ordinary people to use ill-advised resources in their interactions with the government and other public bodies.

3.2 All members of staff and the ICMC governance bodies, together with volunteers and contractors, are required to sign ICMC's all-encompassing declaration during induction.

3.3 We support the application of the zero-tolerance policy by providing:

- **Directives** and rules to establish appropriate and expected behaviour.
- Effective **deterrents** to inappropriate behaviour in the form of meaningful consequences.
- **Prevention** measures to reduce the risk of fraud or bribery occurring.
- **Detection** measures to identify fraud or bribery if it happens, including whistle-blower lines.
- **Response** measures to ensure we react well to suspicions, allegations, and proven incidents of fraud and bribery, including protection and fair treatment for the accusers and accused.
- **Measurement** processes to evaluate the impact and success of our anti-fraud and bribery policy and management of risk.
- Deliberate proactive steps to embed anti-fraud & bribery thinking into our **culture**, including staff training and awareness.

3.4 Anyone found guilty of fraud or bribery will be subject to disciplinary measures, which ordinarily include dismissal and recovery of losses, and may result in prosecution by competent governmental authorities. ,.

4 Anti-Bribery Policy

4.1 ICMC employs all legal and safe tactics to avoid and resist paying bribes to public officials, even if it results in denials, delays, inconvenience, and increased cost to our operations.

- 4.2 No person is authorized to pay a bribe on behalf of ICMC or use ICMC funds for such a purpose.
- 4.3 Individuals are not expected to put themselves or others at real risk of personal harm or injury in the face of undue pressure to pay bribes. A payment under such circumstances is considered extortion rather than bribery.

5 Conflicts of Interest

- 5.1 A conflict of interest exists where an employee or a member of ICMC Governance Bodies has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of ICMC.
- 5.2 The purpose of this policy is to ensure that all conflicts of interest are **declared**, declared conflicts are **managed** to mitigate the associated risks, and that decisions and actions are **documented** to ensure transparency and accountability.
- 5.3 Examples of conflicts of interest include (but are not limited to):
 - Relationships between members of the management team, accounts staff, procurement staff, HR staff or members of ICMC Governance Bodies, and any other staff member.
 - Relationships between any person and their line manager
 - Relationships between ICMC staff, or members of ICMC Governance Bodies, and suppliers, donors, grantees, beneficiaries, or job applicants.
 - A 'relationship' in this context could include family, romantic relationships, being a bank signatory, advisor.
- 5.4 The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed and managed promptly.
- 5.5 All staff (including those listed above) are required to disclose conflicts of interest as soon as they arise, or the staff member becomes aware of the conflict of interest. Examples of such disclosures would include:
 - A close friend of a staff member applies for a job with ICMC.
 - A potential supplier presented to the procurement committee is a company where a committee member is a Governing Committee member.
- 5.6 If a conflict arises or is discovered, it should be immediately declared using the form in Appendix III.

5.7 Appropriate actions should be taken to resolve the conflict of interest, which may be temporary or permanent.

5.8 The steps taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.

6 Gifts and Entertainment

6.1 Issues related to offers of gifts and entertainment should be in compliance with the ICMC Gift Acceptance Policy.

6.2 Gifts and entertainment should never be used or allowed to influence business decision-making.

7 Speaking Up

7.1 ICMC's policy on speaking up is enacted through its Whistleblowing and Complaints procedures. There are designed to build confidence to report genuine concerns about fraud, bribery, or other types of misconduct. For many cases of misconduct, someone reporting it is the only way it can be discovered and dealt with.

7.2 A genuine concern is sincerely felt and based on information the reporting person believes to be true or trustworthy. Upon further investigation, a genuine concern may or may not turn out to be true. The motivation of the person reporting a genuine concern is not relevant to its definition as a genuine or not.

7.3 A false accusation is when the reporting person knowingly fabricates information or reports information, they know to be false.

7.4 ICMC's whistle-blower policy procedures should be followed by all relevant persons to raise any genuine concerns.

7.5 A genuine concern should be reported when there is evidence or a strong suspicion of misconduct in any of the following areas:

- Fraud or bribery
- Sexual misconduct
- Harassment
- Any illegal act

- 7.6 Concerns must be reported, either in person or by email, to the appropriate and responsible senior staff manager in ICMC Headquarters (Secretary General, and/or COO). Staff who feel unable to report through these channels must report any suspected breaches following ICMC's Whistleblowing Policy and Procedure.
- 7.7 ICMC will address any concerns raised with the reporting person within 48 hours, assuming contact details have been provided.
- 7.8 Information about the whistleblowing and complaints procedures will be made available:
 - On the website
 - Located in a searchable directory on the organization's online database.

8 Supporting Reporting Persons

- 8.1 ICMC has zero tolerance to any form of retaliation against reporting persons or whistle blowers.
- 8.2 All relevant persons who report genuine concerns will be properly protected and supported as per the details outlined in ICMC's Whistle-Blowing Policy.
- 8.3 Details of any allegations or suspicions raised should be recorded on a Fraud, Bribery, and Misconduct report form Appendix IV and submitted to the Secretary General.