



## **CHANGE FOR CHILDREN (CFC) Anti-Corruption and Transparency Policy**

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### **Rationale/Purpose**

CFC recognizes that corruption, lack of transparency, and unequal access to resources are fundamental causes of poverty and injustice, and thus a commitment to anti-corruption and transparency, both internally and externally, are central to CFC's vision of **"human dignity, healthy communities, and global justice."** CFC strives to ensure that all funds and resources entrusted to it are managed in the most fair, effective, and transparent manner possible. There is no room for fraud and corruption which divert resources elsewhere.

With the adoption of the [Sustainable Development Goals](#) in November 2017, Change for Children recognizes that achieving these goals is advanced through the fair, efficient, effective, and transparent management of funds and resources. SDG #16 - Peace Justice and Strong Institutions seeks to promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.

### **Principles**

CFC will hold its Board members, staff, volunteers, and partner organizations to the highest standards of honesty and transparency in the management of funds and resources.

Fraud and corruption include, but are not limited to:

- corrupt practice - offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party;
- fraudulent practice - any 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;
- collusive practice - an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party;
- coercive practice - impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.

## **Objectives and Strategies**

The CFC anti-corruption policy applies to the following areas of organizational activity: 1) governance and organizational culture, 2) programs and projects, and 3) public image and communications.

### **1. Governance and Organizational Culture**

CFC shall apply a zero-tolerance policy when it has determined through an investigative process that its staff, consultants or individuals acting as representatives of CFC have engaged in fraudulent, corrupt, collusive or coercive practices. 'Zero tolerance' means that CFC will pursue all relevant allegations and apply appropriate sanctions if the allegations are substantiated.

CFC shall enforce a range of disciplinary measures and sanctions for all such cases, in accordance with applicable CFC rules and regulations and contractual provisions. Such measures will include referral to the appropriate authorities where warranted. Where such cases concern individuals employed by another entity, CFC shall take all possible steps to ensure that the other entity takes appropriate actions.

CFC will continue to improve its internal controls so as to ensure that it is effective in preventing, detecting and investigating fraudulent, corrupt, collusive and coercive practices pertaining to its staff, consultants or its representatives. It shall take all possible actions to protect from reprisals individuals who submit allegations of corrupt practices in its activities and operations and individuals subject to unfair or malicious allegations.

### **2. Programs and Projects**

CFC shall apply a zero-tolerance policy when it has determined, through an investigation performed by the CFC Board, the partner or another competent entity, that fraudulent, corrupt, collusive or coercive actions have occurred in projects financed through its loans and grants, and it shall enforce a range of sanctions in accordance with the provisions of applicable CFC rules and regulations and legal instruments. 'Zero tolerance' means that CFC will pursue all relevant allegations and apply appropriate sanctions if the allegations are substantiated.

CFC will continue to improve its internal controls, including controls inherent in or pertaining to its project activities, so as to ensure that it is effective in preventing, detecting and investigating fraudulent, corrupt, collusive and coercive practices. CFC shall take all possible actions to protect from reprisals individuals who help reveal corrupt practices in its project or grant activities and individuals or entities subject to unfair or malicious

allegations.

### **3. Public Image and Communications**

In an effort to maintain transparency with our supporters and the public, the CFC Board and staff will carefully assess what is appropriate in terms of public disclosure of cases of corruption and fraud identified and managed within the organization and its activities with partner organizations.

#### **Accountability**

The CFC Strategic Plan and the organization's progress towards it are reported at each Board meeting as part of the Executive Director's Report. Specific plans on how this policy will be implemented and evaluated in the current year are discussed during this report. The CFC Executive Director is responsible to lead the implementation of this policy, and to report progress annually to the Board.

*Approved by CFC Board: March, 2023*

*Date for Review: March, 2028*