



GOAL Anti-Fraud Policy

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Member:	<ul style="list-style-type: none"> • all board members/trustees, board committee members and company members of each of GOAL, GOAL (International) and GOAL USA, Inc. (GOAL USA), together with GOAL’s branches/liaison offices in programme countries; • all GOAL employees (Head Office and Field), secondees, interns and volunteers; and • all consultants/contractors/suppliers* (including internal consultants with a GOAL email address) • all GOAL partners* <p>* Must adhere to either: GOAL’s Anti-Fraud Policy, in which case they shall implement their own reporting and management system; or their own internal, corresponding policy with standards equivalent to GOAL’s Anti-Fraud Policy. In either case, they shall certify compliance to GOAL periodically.</p>
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1. Introduction

GOAL is committed to acting professionally and fairly in all of its dealings and relationships, employing the highest standards of openness, transparency and accountability. GOAL promotes a culture of honesty and integrity, and totally opposes any form of fraud, bribery or corruption. GOAL operates a zero-tolerance policy towards all forms of fraud, bribery and corruption.

Fraud, bribery and corruption impact disproportionately on the poor and the most vulnerable people in the world. Such criminal activities divert resources intended for humanitarian assistance and development away from our intended beneficiaries; they increase the costs of basic public services; and undermine economic growth. Such actions are a barrier to poverty alleviation and good governance.

GOAL's Board(s) CEO and Senior Management Teams are committed to the implementation of this policy and to ensuring that training and support is provided to all employees and Board members on its content, and on their individual and collective responsibilities.

2. Applies to

The GOAL Anti-Fraud Policy applies to all Members of GOAL.

“GOAL” includes GOAL, GOAL (International), GOAL USA, Inc. (GOAL USA) and all GOAL branches and/or liaison offices in programme countries and any subsequent subsidiaries/affiliates incorporated from time to time.

“Members” are defined as:

- 1.1 all board members/trustees, board committee members and company members of GOAL (as defined);
- 1.2 all employees of GOAL (Head Office and Field);
- 1.3 all secondees, interns and volunteers of GOAL;
- 1.4 all consultants/contractors/suppliers (including internal consultants with a GOAL email address) of GOAL; and
- 1.5 all GOAL Partners (i.e., those entering into partnership agreements with GOAL, GOAL (International) and GOAL USA, Inc. (GOAL USA). Staff with responsibility for managing partnerships must ensure that this Policy is included or referenced in any agreements with partners.

3. Purpose

The purpose of the GOAL Anti-Fraud Policy is to provide clear definitions of what we mean by fraud, bribery and corruption. It is also a definitive statement to Members (as defined) - making clear that GOAL will not tolerate fraudulent or corrupt activities, and the giving or receiving of bribes. This policy summarises the responsibilities of all Members (as defined) to adhere to and uphold GOAL's position on fraud, bribery and corruption.

4. Definitions

a. What is Fraud?

Fraud is a generic term used to describe a range of illegal activities. These include, but are not limited to, deception, forgery, theft, the false reporting or concealment of material facts, collusion and corruption (including bribery) and intentional undeclared conflicts of interest (CoI), or non-adherence to CoI instructions (see GOAL's Conflicts of Interest Policy).

Examples of fraud other than bribery, include, but are not limited to:

- Theft of money, property or assets.
- Inappropriate use of company assets with the intent to defraud.
- Submitting false expense claims.
- Forging, tampering with or falsely creating documents, including printed and electronic materials, records, onlinematerials and electronic devices.
- Destroying or removing documents or records (including without limitation email or phone correspondence).
- Knowingly creating or distributing false financial information or reports.
- Deliberately ignoring or acquiescing in fraudulent activity.
- False Accounting.
- Unlawful Use of a Computer or a Phone.
- Use/Custody of False documents or records with the intent to defraud.
- Possessing or using counterfeit currency in or outside the State.
- Falsification, concealment, destruction or disposal of a document, or documents or information with intent, in circumstances whereby it is reasonable to conclude that the person knew or suspected that the document or information was or would be important and or/ relevant to conducting an investigation.

b. What is Bribery and Corruption?

Bribery and corruption have a range of definitions in law. The following is a plain language guide.

Bribery: The unlawful act of offering or receiving any gift, loan, fee, reward or other advantage (taxes, services, donations, etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties.

Corruption: The abuse of entrusted power or influence for private gain.

While the below list is not exhaustive, following are some examples of bribery:

- A potential supplier offers money or a gift to influence a procurement/tender process.
- A GOAL Member (as defined) seeks, requests or solicits, directly or indirectly, a bribe or favour in any form, as an inducement to do something which is dishonest, illegal or a breach of trust in the context of one's duties.
- A job applicant offers payment or a gift to increase his/her chances of being hired.
- A gift (e.g., excessive hospitality) is offered to a local official, in return for him/her approving a proposal.
- An NGO hires the daughter of a local official; the following month the NGO asks the official to grant an important permit.
- A potential or actual beneficiary offers a payment or a gift in return for allowing him/her or their family to be given aid to which they are not entitled.
- A government official asks for a payment to secure an NGO registration.
- A customs official asks for an unofficial payment or gift to release goods (The last two examples may also be considered facilitation payments, which are simply another form of bribery – see policy statement section).

c. What is a 'Facilitation Payment'?

This is usually a bribe in the form of a small, unofficial payment. It is made to secure or expedite the performance of a routine or necessary action to which the person making the payment has legal or other entitlement, e.g., an unofficial payment made to a border guard/officer in return for a speedier crossing.

d. What are 'Kickbacks'?

Kickbacks are typically payments made in return for a business favor or advantage.

e. What are 'Payments under Duress'?

Payments made under duress are in response to demands accompanied by threats to life, limb or liberty.

f. What are 'Gifts and Hospitality'?

These can range from small gifts or promotional materials (such as diaries and pens) to expensive hospitality (such as drinks, dinner or a holiday). Extravagant gifts and hospitality may be thinly veiled bribes intended to induce improper behaviour.

5. GOAL Policy Statement

GOAL has zero tolerance for fraud, bribery or corruption in any form.

Where criminality occurs, the loss is not just to GOAL but, much more importantly, to GOAL's program participants who are among some of the poorest and most vulnerable people in the world. It may also have a major impact on GOAL's reputation and, as a consequence, donor confidence in GOAL. This, again, ultimately impacts upon our those we seek to support and serve. GOAL will conduct, manage, and monitor all aspects of our work in a way that reduces and eliminates opportunities for fraudulent or corrupt activity, including the giving or accepting of bribes. Wrongdoing activity frequently raises Red Flags and it is imperative that these can be recognized; a non-exhaustive list of potential Red Flags is included in Appendix 1.

Facilitation Payments and 'Kickbacks'

GOAL prohibits the solicitation, provision or acceptance of facilitations payments and/or 'kickbacks'. If someone suspects any such payments to be solely for the purposes of legitimate facilitation, they should ask that a detailed receipt be provided. If there appears to be no legitimate reason for a request for a payment, it should be explained that GOAL does not make or accept facilitation payments. If a GOAL employee feels it is safe and appropriate to do so, they should ask to speak to the supervisor of the person requesting the payment. Such instances should also be reported confidentially through speakup@goal.ie.

If a receipt can be provided and the Member (as defined) does not suspect the payment is for the

purposes of facilitation, a payment will be allowable.

Payments under Duress

It is permissible for a payment to be made in the rare and exceptional circumstances where it is believed necessary to protect against loss of life, limb or liberty (except in the case of lawful detention). If possible, the circumstances and proposed payment should be discussed in advance with a line manager and escalated immediately to senior management in country. In all such cases an incident report must be submitted, as per the GOAL Security Policy. GOAL retains the services of a specialised consultancy agency to advise in such instances.

Gifts and Hospitality

The giving or receiving of gifts (other than those deemed to be small promotional items) by or on behalf of GOAL is not permitted under any circumstances. Where corporate gifts are donated by supporters they will be managed in line with GOAL's Guidance on Management of Gifts.

Members (as defined) must exercise great caution when offering or accepting hospitality and entertainment. They must be certain that what is being offered is not designed to gain improper benefit or does not otherwise amount to fraud, bribery or corruption.

The providing or accepting of hospitality or entertainment is allowed, as long as:

- a. It is not done with the intention of influencing the behaviour of the recipient;
- b. It is done openly;
- c. It complies with local law.

If a Member (as defined) wishes to offer entertainment or hospitality, it must be authorised by a senior manager in advance and in accordance with GOAL's [Guidance on Management of Gifts](#).

Fundraising

Fundraising, and fundraising opportunities are distinct from Gifts and Hospitality and follow a specific due diligence assessment. These assessments are carried out by a member of the fundraising team under one of the following categories:

- Solicited Large Corporate Donation >€5,001
- Unsolicited Large Corporate Donation >€5,001
- Cause Related Marketing Opportunity
- Corporate Supporter new to GOAL
- Trust or Foundation new to GOAL

6. Responsibilities

GOAL Board Members (as defined) are responsible for protecting GOAL and the communities we serve from the impact of fraud, bribery and corruption by always acting in accordance with this policy and GOAL's Code of Conduct.

The Investigations Department is responsible for overseeing the investigation of all allegations or complaints of wrongdoing, including those concerns related to fraud, bribery and corruption. The Investigation Department also develops strategies for the prevention, detection and investigation of wrongdoing, along with promoting a risk intelligence culture within the organization. Furthermore, the Investigation Department liaises with law enforcement authorities and regulatory authorities as required.

a. Boards of Directors

GOAL's Boards of Directors are responsible and accountable for ensuring that the organisation is compliant with all obligations.

The Audit and Risk Committee, which reports in to the Board of Directors, supervises the implementation of this policy through its oversight of GOAL's Internal Audit, Investigation and Complaints Response functions. These functions report on an ongoing basis to the Audit and Risk Committee where reports of suspected or alleged cases of fraud, bribery and corruption are raised and discussed and the Board of Directors are provided with an update from the Audit and Risk Committee at quarterly Board meetings.

b. Managers and Senior Staff

It is incumbent upon GOAL managers and senior staff to set an example by complying fully with GOAL's policies, procedures and controls. Managers and senior staff are responsible for ensuring that employees under their charge are trained on and fully understand the GOAL Anti-Fraud Policy, and the consequences of non-compliance.

Managers and senior staff should be familiar with and alert to the types of fraud, bribery and corruption that might occur in their area(s) of responsibility. In particular they should:

- Ensure that this policy and all GOAL's systems, financial controls and procedures are fully understood by staff.
- Frequently check that these are being fully observed and implemented.
- Regularly review and, where necessary, update controls and procedures.
- Enable staff to assess programming and project initiatives for fraud and bribery risks.
- Consider the reporting of fraud to the relevant law enforcement and/or regulatory authorities.
- Consider all available avenues to recover any losses to GOAL or its donors arising from fraud.
- Ensure that all instances of suspected fraud are escalated to the Complaints Response Group (CRG) in GOAL Head Office through speakup@goal.ie or goal@safecall.co.uk.
- Ensure that all instances of suspected fraud are assessed and if necessary, investigated.

c. All Employees

It is the responsibility of every GOAL employee to carry out their work and conduct themselves at all times in such a way as to prevent fraud, bribery and corruption. All Members must be alert to and report any actual or suspected instances of fraud, bribery and/or corruption.

d. Responsibility of the Organisation

GOAL will take all reasonable steps and exercise all due diligence to avoid the commission of a corruption offence. Included within these due diligence processes are Periodic Risk Assessments. The GOAL Audit and Risk Committee (ARC) shall regularly convene (at minimum, once a year) to assess risks, including those covered by this policy. ARC will assess, update and record existing and potential risks to the organisation's human and material assets and the Board of Directors are provided with an update from the Audit and Risk Committee at quarterly Board meetings. GOAL continues to assess the effectiveness of current controls in place to prevent the risk of corruption within the organization.

7. Raising a concern

If someone connected to GOAL, or a Member is offered or asked to pay a bribe, they must refuse and explain that bribery runs contrary to GOAL's Anti-Fraud policy. If someone suspects that fraud, bribery or corruption is, has, or is likely to take place, they should at the earliest opportunity report the matter in accordance with GOAL's Whistleblowing Policy. The interests and well-being of those making a report will be fully protected by GOAL's Whistleblowing Policy.

Failure on the part of a Member to report actual or suspected fraud, bribery or corruption, may lead to disciplinary procedures being instigated, up to and including dismissal and/or legal proceedings. GOAL may have a legal obligation to report actual or suspected fraud, bribery or corruption to relevant authorities. Individuals found guilty of committing fraud, bribery or corruption may face penalties including fines and/or imprisonment. Furthermore, under Irish law, certain acts of corruption committed by Irish citizens or residents, may be prosecuted under Irish law, even if the act was committed outside of Ireland.

If a Member knowingly lodges a false report, this will be regarded as a serious disciplinary offence and dealt with in accordance with GOAL's disciplinary procedures.

GOAL's Investigation Department has a particular responsibility to investigate allegations of serious wrongdoing in GOAL (as defined), including allegations of fraud, bribery and corruption. Members who suspect an actual or suspected wrongdoing should raise this concern using SpeakUp. The contact details for SpeakUp and the Complaints Response Director are:

Phone: (01) 280 9779

Email: speakup@goal.ie

Address: Complaints Response, Carnegie House, Library Road, Dun Laoghaire, Ireland

Alternatively, GOAL has an externally managed hotline for staff and suppliers through which whistleblowing disclosures can be made. Safecall* can be contacted 24 hours a day from anywhere in the world. Disclosures made through Safecall will include as much relevant information as possible

before being passed to GOAL. Disclosure reports will be passed to the Complaints Response Director and the Director of Investigations for action. In exceptional circumstances where this is not appropriate, reports will be passed instead to the CEO or GOAL's Board of Directors.

In addition, communities, suppliers and partners are encouraged to raise their concerns through GOAL's Community Feedback Mechanism (CFM) in line with our internal disclosure procedure.

**Safecall: www.safecall.co.uk/report or goal@safecall.co.uk*

8. Communication and Training

New Members to GOAL will receive, as part of their onboarding process, a mandatory induction in relation to this Anti-Fraud Policy. Ongoing refresher courses and training on anti-fraud will also be conducted.

GOAL aims to be a sector leader on counter fraud and is committed to knowledge sharing not only internally, but in the sector more widely. To this end GOAL commits to participating in external panels and workshops to strengthen learning throughout the sector.

9. Compliance with this policy

9.1 Compliance with all GOAL Policies, including this Anti-Fraud Policy, forms part of a Member's annual appraisal.

9.2 Any violations of this Anti-Fraud Policy, including any failure to report fraud, bribery or corruption (actual or potential), will be dealt with in accordance with GOAL's Disciplinary Procedure and may result in a disciplinary sanction up to and including termination of employment or removal from a GOAL board, or expulsion from being a committee member or company member.

9.3 GOAL reserves the right to report any suspected fraudulent or criminal activities to the relevant authorities.

10. Oversight

GOAL continues to develop ways of assessing fraud, bribery and corruption risks, across project/programme life cycles in every country; including gap analysis, risk assessments and associated registers which are updated on a regular basis. A quarterly risk review is undertaken by GOAL and updates are regularly reported to both the Audit and Risk Committee and the Board of Directors. These processes are updated as required to ensure that bribery and corruption risks are assessed and addressed at all levels of the organisation.

11. Data Protection

Any information provided to GOAL under this Anti-Fraud Policy will be processed in accordance with applicable data protection law and for the purposes set out herein. This will include the processing of information to ensure that Members act in the best interests of GOAL and that GOAL complies with the requirements of all donor contracts. Such information will be also declared in GOAL's accounts and annual report where required under applicable law or accounting guidelines

12. Associated Policies and Procedures

The GOAL Anti-Fraud Policy is linked to and must be read in conjunction with:

- GOAL Whistleblowing Policy;
- GOAL Code of Conduct;
- GOAL Conflict of Interest Policy;
- GOAL Security Policy and Crises Management Plans;
- Guidance on Management of Gifts; and,
- GOAL Data Protection Policy

Appendix I: Fraud Red Flags

This list is not exhaustive as the ingenuity of those involved in fraud, bribery and corruption cannot be underestimated:

- Abnormal cash payments
- Pressure exerted for payments to be made urgently, or ahead of schedule without appropriate rationale
- Payments being made through a third-party country - for example, goods or services supplied to country 'A' but payment is being made, usually to a shell company, in country 'B'
- An abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions
- Private meetings with public contractors or companies hoping to tender for contracts
- Lavish gifts being offered or received
- A person who never takes holidays, time off when ill, or insists on dealing personally with specific contractors
- Unexpected or illogical decisions made to accept projects or contracts
- An unusually smooth processing of cases where an individual does not have the required level of knowledge or expertise
- Abuse of the decision-making process or delegated powers in specific cases
- Agreeing to contracts, even where the terms or the time period are not favourable to GOAL
- An unexplained preference for certain contractors during the tendering period
- Avoidance of independent checks on the tendering or contracting processes
- Raising barriers around specific roles or departments that are key to the tendering or contracting processes
- Invoices being agreed in excess of the contract, without reasonable cause
- Missing documents or records of meetings or decisions
- Company procedures or guidelines not being followed
- Lack of sufficient / independent oversight of practices and procedures
- Payment(s) on behalf of others of high value expenses
- Staff living beyond their means i.e., unexplained wealth

Partner Organisation Red Flags

- A partner organization does not anticipate fraud and believes kickbacks, collusion, and theft are rare
- For "security" or "reputational" reasons, a partner organization claims it cannot share information with other partners about corrupt staff, vendors, or sub-partners
- An organization has been operating in the area for several years and continues to have a number of waivers and deviations from normal policy
- A partner organization does not provide conflict-of-interest or anti-fraud training or materials
- A partner organization does not have a structured complaints reporting and response mechanism
- A partner organization does not have a suitably qualified investigative capacity
- A partner claims to be the only organization with access to a particular area
- A partner is reluctant to grant access and oversight to offices, warehouses, clinics, etc.
- Lack of partner oversight of their own offices, warehouses, suppliers and programmes.

Procurement Red Flags

- Your organization has a high threshold for publicly advertised procurements
- Your organization frequently uses sole source waivers and frequently justifies procurement decisions with subjective product quality or capacity reasons
- Staff collect bids in person from the same vendors without witnesses or rotation
- Procurement staff solicit tenders with very short response times or specifications such that only a specific vendor could win the contract
- You select vendors based on quality but do not keep bid samples for later review
- Your quality control process is based on contract specifications and not the bid sample
- Staff do not complete market surveys to ascertain the true market value of goods and/or services procured
- Staff do not conduct regular supplier visits and due diligence to ensure the legitimacy and commercial viability of suppliers retained
- Staff do not maintain up to date supplier listings
- Staff utilize personal Gmail, and other forms of personal communications such as WhatsApp, to conduct GOAL procurement business
- Procurement staff request PDF editing software to be installed on their GOAL devices without Senior Management Authorisation
- Procurement staff accepting bids received after the deadline date
- Companies repeatedly securing procurements, or varying types of procurements

Medical and Pharmaceutical Programme Red Flags

- You use one employee to deliver all clinic or hospital staff salaries in a location, for example, and do not conduct verifications to ensure all staff are real and received payment in full
- Inventory is not properly tracked and documented to prevent distribution of expired items

Warehousing and Storage Red Flags

- Inventory counts, and reconciliations are not periodically performed
- Warehouses are not organized and inventory is not sorted and properly labelled
- Vendor delivery inspections never find any discrepancies

Transportation and Distribution Red Flags

- You believe you cannot implement many monitoring and evaluation safeguards, like site visits and video recorded distributions, due to security
- You have no capacity to operate in an area without a sub-partner

Reporting Red Flags

- You have never received an allegation of fraud
- You fire staff or take action without notifying donor(s) of the incident
- Previous incidents have not been reported expeditiously
- Your organization conducts its own internal investigations of fraud or theft-related incidents without notifying donor(s)
- Your organization has conducted numerous fraud investigations relating to a single project and found no concrete evidence of fraud