

Anti-Fraud, Bribery, Corruption and Whistleblowing Policy

Policy Owner	Scientific & Strategic Advisory Board
Approved By	ARNECH Scientific & Strategic Advisory Board
Effective Date	2021
Next Review Date	January 2027
Version	3.0
Applies To	All ARNECH staff, consultants, subcontractors, and field teams
Last Updated	January 2025

1. Purpose

This policy sets out ARNECH's zero-tolerance approach to fraud, bribery, and corruption, and establishes a confidential public interest disclosure (whistleblowing) procedure through which concerns can be raised safely.

2. Scope

This policy applies to all ARNECH staff, consultants, Advisory Board members, and subcontractors, and to their dealings with clients, donors, government officials, and other third parties in every country in which ARNECH operates.

3. Policy Statement

ARNECH does not tolerate fraud, bribery, or corruption in any form. All personnel are prohibited from:

- Offering, giving, soliciting, or accepting a bribe or improper advantage to obtain or retain business or a personal benefit
- Making or authorising facilitation payments
- Misappropriating, diverting, or falsely claiming project or institutional funds
- Colluding with suppliers, partners, or officials to circumvent procurement or reporting controls

Employees and partners who raise concerns about suspected fraud, bribery, or corruption in good faith are protected from retaliation, dismissal, or disadvantage as a result of doing so.

4. Roles and Responsibilities

- The Scientific & Strategic Advisory Board owns this policy and receives reports of substantiated cases.
- A designated Whistleblowing Contact receives and logs disclosures, ensuring confidentiality of the reporter's identity to the extent possible.
- Unit Heads are responsible for promoting awareness of this policy within their teams.

5. Procedures

- Concerns may be raised verbally or in writing, and anonymously if preferred, through the designated Whistleblowing Contact or directly to the Advisory Board.
- All disclosures are acknowledged, logged, and assessed for investigation within a defined timeframe.
- Investigations are conducted by individuals independent of the matter under review; findings and recommended actions are reported to the Advisory Board.
- Substantiated cases may result in disciplinary action, termination of engagement, recovery of funds, and referral to law enforcement or donors as appropriate.

6. Reporting Concerns and Breaches

Reports can be made to the designated Whistleblowing Contact, any Unit Head, or directly to the Scientific & Strategic Advisory Board. ARNECH commits to investigating all reports promptly, fairly, and confidentially, and to protecting reporters from any form of retaliation.

7. Training and Awareness

All staff and consultants receive briefing on this policy at induction, including how to recognise and report suspected fraud, bribery, or corruption. Refresher communications are issued periodically.

8. Related Standards and References

This policy is aligned with the following external standards and frameworks:

UK Bribery Act 2010 — <https://www.legislation.gov.uk/ukpga/2010/23/contents>

UN Convention against Corruption — <https://www.unodc.org/unodc/en/corruption/uncac.html>

9. Monitoring and Review

This policy is reviewed by the Scientific & Strategic Advisory Board at least every two years, or sooner where changes in law, donor requirements, or organisational practice require it. Comments and proposed amendments may be submitted to the Policy Owner at any time.

Registration certificates, financial statements, and full policy documentation are available on request for prospective partners, clients, and funders as part of due diligence.

