GHANA RED CROSS SOCIETY

COUNTER FRAUD AND CORRUPTION POLICY

Ghana Red Cross Society

Counter Fraud and Corruption Policy

Introduction

Fraud and corruption within the context of humanitarian and development aid erode public trust, divert critical resources, and undermine the mission to assist vulnerable populations affected by disasters, conflict, and hardship. As a principled and accountable humanitarian organization, the Ghana Red Cross Society (GRCS) upholds a strict zero-tolerance policy toward all forms of fraudulent and corrupt practices. The Society is committed to fostering a culture of integrity, transparency, and accountability, and to implementing effective systems to prevent, detect, manage, and respond to fraud and corruption risks.

Article 1 – Purpose

This policy outlines the Ghana Red Cross Society's commitment to:

- Promoting ethical conduct and good governance in all its operations.
- Defining clear guidelines and responsibilities for fraud and corruption prevention, detection, reporting, investigation, and sanction.
- Ensuring that all stakeholders, internal and external, are aligned with the Society's principles of accountability and integrity.

Article 2 – Scope and Application

This policy applies to all individuals and entities acting on behalf of, or associated with, the Ghana Red Cross Society, including but not limited to:

- Employees
- Volunteers
- Consultants
- Interns
- Officers
- Representatives
- Contractors, suppliers, and partners

All parties are expected to be familiar with the provisions of this policy and to uphold its principles in all professional engagements with the Society.

Article 3 – Definitions

Fraud
A deliberate act or omission intended to deceive or mislead, to gain an undue material or moral advantage, or to avoid a legal or contractual obligation.

Corruption
The abuse of entrusted power or influence for private gain. This includes offering, soliciting, giving, or receiving any bribe or inducement to influence the actions of an official or representative in breach of trust.

Conflict of Interest
A situation where an individual's personal, familial, or financial interests compromise or are perceived to compromise their ability to perform their duties impartially.

Nepotism
Favouritisms shown to relatives or close associates, particularly in employment, procurement, or resource allocation. This includes appointing or promoting family members as defined under customary and legal frameworks.

Article 4 – Roles and Responsibilities

- Board of Directors: Provides strategic oversight, promotes a zero-tolerance culture, and ensures effective application of this policy, including receiving and reviewing annual fraud reports.
- Management: Leads operational implementation, conducts risk assessments, promotes internal controls, and ensures training and compliance across departments.
- All Staff and Volunteers: Share responsibility to uphold this policy, report suspicious activity, and foster an ethical organizational culture.

Article 5 – Preventive Measures

To mitigate fraud and corruption, the GRCS shall implement:

1. A Code of Conduct that clearly defines prohibited behaviours and expected standards.
2. A confidential ethics or ombudsperson mechanism, such as the Integrity Line, to advise staff and manage declarations of interest.
3. Mandatory conflict of interest declarations by those in positions of trust.
4. An accessible and anonymous whistleblowing mechanism for internal and external stakeholders.
5. A regularly updated fraud risk register and control matrix.
6. Training and awareness programs for staff, management, and volunteers.

7. Due diligence procedures for vendors, contractors, and project partners.
8. Background checks for individuals in positions of trust or with access to resources.
9. Robust internal and external audit mechanisms, including unannounced checks.
10. Sanction procedures, ranging from warnings to dismissal and prosecution.
11. An internal monitoring and evaluation system to assess effectiveness and compliance.

Article 6 – Procurement Integrity

All procurement processes shall be governed by principles of transparency, competition, fairness, and value for money. Procurement decisions must be based on documented objective criteria, subject to threshold limits, and compliant with both GRCS and donor requirements.

Article 7 – Financial Management

The Society shall enforce strong financial management standards, including:

1. Transparent and participatory budget adoption processes.
2. Timely and accurate reporting on income and expenditures.
3. Use of standard accounting and auditing practices aligned with international norms.
4. Robust internal control and risk management systems.
5. Prompt corrective actions when irregularities are detected.

Financial records must be accurate and protected against unauthorized alteration or falsification.

Article 8 – Human Resource Integrity

The GRCS shall maintain a merit-based, fair, and competitive approach to recruitment, promotion, and retention. HR practices shall aim to eliminate favouritism, discrimination, and nepotism, ensuring equal opportunity and organizational professionalism.

Article 9 – Disclosure of Conflicts of Interest

All personnel and members are required to disclose material interests, financial or otherwise, that could influence or appear to influence decision-making. Non-disclosure may constitute misconduct and attract disciplinary measures.

Article 11 – Whistleblower Protection

Individuals who report, in good faith, any suspected misconduct, fraud, or corruption shall be protected from retaliation or discrimination. Any act of obstruction, intimidation, or retaliation against whistleblowers will result in strict disciplinary measures.

Article 12 – Confidentiality of Reporting

All reports, alerts, and complaints shall be handled with strict confidentiality. The identity of whistleblowers and individuals implicated in reports shall not be disclosed, except to competent authorities and only when legally justified.

Article 13 – Investigations

Investigations shall be conducted:

- Fairly, independently, and objectively.
- With full access to records, personnel, and premises.
- By investigators empowered to seize relevant documents, data, and materials without prior notice.

Investigative and disciplinary functions shall remain separated to maintain impartiality and integrity.

Article 14 – Sanctions and Asset Recovery

Any individual found guilty of fraud or corruption shall face appropriate sanctions, including:

- Disciplinary actions (warning, suspension, or dismissal)
- Legal prosecution
- Financial restitution or recovery of misappropriated assets

Restitution of assets shall be pursued to the fullest extent of the law, reinforcing the principle of accountability.

This policy shall be reviewed periodically to ensure continued relevance and effectiveness in accordance with national and international standards