

## **SCEW e.V. Guidelines on Integrity Policy in Addressing Potential Corruption, Fraud and Mismanagement**

### **Preface**

Targeting corruption and improving integrity in managing private and state funds is a clear policy imperative to SCEW e.V. and her Partners.

SCEW e.V. and Partner's policy Guidelines reflect the OECD's position as the world's leading standard setter in anti-corruption and integrity.

SCEW e.V. and Partners believe that this policy will serve as an instrument to promote integrity and fight against corruption.

### **1. The Scope of the Policy:**

This policy applies directly to the following categories:

- Southern Cameroons European Women e.V., members, representatives, and Advisory Board.
- Staffs, workers, volunteers, experts, trainers, Consortium Partners and Beneficiaries.
- Those Intermediary deployed through any of the members in the Consortium.
- Partners, Collaborators, contractors, and associates of the Consortium

### **2. Agreement**

1. All the organisations including their associates agree to operate in utmost honesty, mindful of the regulations in force on the operations of Non-profit activities in the Federal Republic of Germany, EU and Sub-Sahara regions.
2. Every Consortium member agrees to prevent corruption by acting with personal integrity and making ethical choices.
3. All parties, this includes members of the consortium, employees, collaborators, volunteers, suppliers, consultants agree to effectively manage funds entrusted to them.
4. All parties must ensure that their Board members, Project Coordinators, Experts, Staff, Volunteers, and all associates are persons of integrity, who have professional qualifications, selected on merits, potentials, and have good track records.
5. All the Partners commit to disclose all financial donations by both private and state funders in a transparent and consistent fashion.
6. To fulfil requirements for keeping a transparent procedure and to ensure effective accountability, Delegates of the consortium will meet once every month or more regularly if needed and report on the following.
  - On the progress and challenges of the project.
  - Detailed financial update of how the funds are used.
  - Provide pictures and videos of project events, including feedback video from beneficiaries or participants.
  - Submit receipts of expenses and purchases.
  - An independent committee conducts an audit every three months and submits to the Consortium.



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# SOUTHERN CAMEROONS EUROPEAN WOMEN e.V. (SCEW e.V.)

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## 3. Types of fraud, corruption, mismanagement and misconduct the consortium identifies.

1. All parties and their associates are strictly prohibited from misusing funds for private gains.
2. All the Parties and associates should not engage themselves directly or indirectly in any form of corruption or bribery and do not grant, offer, or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.
3. SCEW e.V. and Partners should not directly or indirectly facilitate money laundering.
4. Integrity violations that Corrupt practice, which is the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.
5. Fraudulent practice, which is 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.
6. Coercive practice, which is 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.
7. Collusive practice, which is an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
8. Abuse, which is theft, waste, or improper use of private and state funds, either committed intentionally or through reckless disregard.
9. Conflict of interest, which is any situation in which a party has interests that could improperly influence that party's performance of social duties or responsibilities, contractual obligations, or compliance with applicable laws and regulations.
10. Obstructive practice, which includes:-
  - Deliberately destroying, falsifying, altering, or concealing of evidence material to investigation.
  - Making false statements to investigators in order to materially impede an investigation.
  - Failing to comply with requests to provide information, documents, or records in connection with an investigation.
  - Threatening, harassing, or intimidating any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation.

## 4. Responsibility

1. Allegations of a suspected integrity violation, mismanagement funds, corruption or misconduct are reported to an independent **"Ethic Committee"**.
2. Persons willing to report real or encouraged illegal or irregular practices in and concerning management of funds, should be offered protection in law and practice against all types of unjustified treatments as a result of reporting.
3. The Ethic Committee shall maintain objectivity, impartiality, and fairness throughout the investigative process and conduct its activities competently and with the highest levels of integrity.





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4. The Ethic Committee performs its duties independently from those responsible for or involved in operational activities and from staff members liable to be subject of investigations and shall also be free from improper influence and fear of retaliation.
5. The Ethic committee must ensure that the enforcement of provisions in the legal framework should be rigorous and systematic and ensure nobody is given unfair advantage or protected.

## 5. Ethic Committee

1. The consortium has an **Ethic committee** which is an independent body. It comprises of seven members, - a Lawyer and six other vetted neutral persons of integrity.
2. The duty of the Ethic committee is to ensure that all detected irregularities, concerning state and private funds are investigated and prosecuted, in accordance with domestic legal procedures.
3. They monitor, evaluate, and follow up any indications of corruption and all the cases reported by staffs, volunteers, and beneficiaries.
4. The Ethic Committee engages professionally qualified and independent auditors whose duty is to examine the financial reports of the implementing NGO and the contractors.
5. The names and contact numbers of members of the Ethic committee are made know to all the workers, volunteers, and beneficiaries.
6. The Ethic Committee ensures that civil, administrative, or criminal penalties for corruption or other unlawful acts should be effective, proportionate, and dissuasive.
7. Records are kept in a manner that adheres to the relevant information access laws and case management ethics, including confidentiality and access based on the “need to know”.
8. Data protection procedures guide the Ethic committee on what information should be collected, stored, and used.

## 6. Prevention

To prevent the above from occurring AWE e.V. and Partners have adopted measures necessary to ensure that funds are not misappropriated, by adhering to the highest human resource and recruitment standards:

- **Transparent recruitment** – referencing and vetting of prospective workers, staffs, volunteers, helpers, contractors with emphasis on impeccable track record in carrying out their work in conformity with both state laws and the **Bylaws** (Internal rules and regulations) of the organization.
- All Parties adhere to personal referencing scheme from already existing staffs, volunteers, and friends of the interested.
- AWE e.V. and Partners should regularly assess need for reforms within their internal structures or in the exercise of their duties.
- All Parties, including their staffs, volunteers, beneficiaries, and contractors receive a copy of **Integrity Policy in addressing potential Corruption, Fraud and Mismanagement** and sign that they agree to comply to the terms.



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## 7. Certification

Southern Cameroons European Women e.V., Partners and Associates hereby agree to work in accordance with **Integrity Policy in addressing potential Corruption, Fraud and Mismanagement.**

All members, Volunteers, Collaborators, Contractors, Suppliers, Staffs, Partners Consultants and, in general, all third parties that operate on behalf of Southern Cameroons European Women e.V. are required to adhere to these guidelines.

Duisburg 20<sup>th</sup> January 2021

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