

# Malaria Consortium

## Anti-Bribery Policy



Last updated: June 2017  
Author: Jocelyn Boughton, Chief Finance Officer  
Review date: January 2018

## 1. Purpose and context

Malaria Consortium's policy is to conduct its work in an honest and ethical manner. Malaria Consortium, wherever it operates, takes a zero-tolerance approach to bribery and is committed to ensuring that its employees act professionally, fairly and with integrity in all dealings wherever Malaria Consortium operates. This is to ensure that the organisation benefits from a valued reputation, and donor and partner and beneficiary confidence.

## 2. Principles

Malaria Consortium is committed to implementing and enforcing effective systems to counter bribery.

## 3. Scope

This policy applies to all individuals in the organisation, including trustees, senior managers, employees (whether permanent, fixed term or temporary), volunteers and interns, consultants, partners and any other person or organisation providing services to Malaria Consortium whether paid or unpaid.

All employees will be trained on this policy on joining the organisation as part of their finance induction. They will be asked to sign that have read, understood and agree to abide by its content. All other persons associated with the organisation will be informed of this policy through their contractual arrangements. For existing employees and associated persons the policy is to be communicated via the Country Director in each country, the Regional Programmes Director in the regions and the Financial Controller in the UK.

## 4. Definition and terms

### What is a bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly or;
- To any public official with the intention of influencing the official in performance of their duties. This includes any form of gift or payment to an official in an attempt to speed up or complete a process quicker than usual. The size of the gift is irrelevant.

The UK Bribery Act 2010 became effective from 1 July 2011 and introduced four new offences:

- Offering, promising or giving a bribe
- Requesting, agreeing to receive or accepting a bribe
- Bribing a foreign public official to obtain or retain business; and
- A new strict liability offence for organisations of failing to prevent bribery by those acting on their behalf.

## 5. Implementation

Any individual suspected of offering, promising or giving a bribe, requesting, agreeing to receive or accepting a bribe or bribing a public official will be investigated under the organisation's disciplinary policy and if found guilty will be dismissed for gross misconduct. For any contractor found to offer, promise or give a bribe or requested or agreed to receive or accept a bribe or bribing a foreign public official will have their contract will be terminated immediately, all business dealings will cease and financial compensation will be sought and it will be reported to the authorities as required by the Act.

If any individual is confronted with a request to make a bribe, individuals are to present a copy or explain this Anti-Bribery Policy and must not agree to the bribe in any circumstances. All vehicles should carry a copy of the policy for this purpose.

### Gifts and hospitality

This policy does not prohibit the giving and receiving of promotional gifts of low value and normal and appropriate hospitality. Gifts and hospitality may amount to bribery, therefore these must not be offered or given with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties. Gifts of up to GBP 10.00 can be accepted provided this is approved by the Country Finance Manager and recorded on the country Gifts and Hospitality Register. Items of a negligible value such a paper calendars and pens do not need to be declared. The limit of GBP 10.00 applies per person, so if for example a box of chocolates is received and shared in the office among all staff this is considered acceptable. All gifts or hospitality offered must be reported to the Country Finance Manager whether or not the gift is to be accepted.

Malaria Consortium does not give out gifts, although within projects, some activities, such as low cost incentives to voluntary workers, may be acceptable. These must be within the original project and its budget as agreed with the donor.

The register will be accessible by the Country Director, internal and external auditors and to regional and HQ staff performing checks on visits to the country.

### Facilitation payments and kickbacks

Malaria Consortium does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, for example to clear goods or persons through customs. Kickbacks are typically payments made in return for a business favour or advantage, for example, to reduce delivery time on goods and services. All employees must avoid any activity that may lead to, or suggest, that a facilitation payment or kickback will be made or accepted on behalf of Malaria Consortium.

### Donations

Malaria Consortium does not make contributions of any kind to political parties.

## Financial Systems

Malaria Consortium will keep financial records and ensure appropriate internal controls are in place to ensure there is an evidence trail for any payments made to third parties, in order to prevent corrupt payments taking place.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with the financial procedures and must specifically record the reason for the expenditure.

All accounts, invoices, memoranda and any other documents and records relating to dealings with third parties, such as clients, suppliers and other business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal any payments.

## Whistle Blowing

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage in accordance with Malaria Consortium’s Whistle Blowing Policy. Malaria Consortium will apply criminal and administrative sanctions in a robust manner to demonstrate a zero tolerance to bribery.

## Monitoring

The effectiveness of this policy will be regularly reviewed by the Board of Trustees and internal control systems and procedures will be subject to audit under the internal audit process.

### Malaria Consortium

Development House 56-64 Leonard Street London  
EC2A 4LT, United Kingdom  
[www.malariaconsortium.org](http://www.malariaconsortium.org)  
[info@malariaconsortium.org](mailto:info@malariaconsortium.org)

UK Registered Charity No: 1099776 US EIN: 98-0627052

**malaria consortium**  
*disease control, better health*