

ANNEX-4: SAVE THE CHILDREN'S ANTI-BRIBERY AND CORRUPTION POLICY

1. Save the Children does not allow any employee, implementing partner, supplier, agent or volunteer to behave in a corrupt manner while carrying out Save the Children's work.

Behaviour which amounts to corruption includes but is not limited to:

- a) Paying or Offering a Bribe – where an employee improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another in order to influence their conduct in any way.
 - b) Receiving or Requesting a Bribe – where an employee improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence the employee's conduct in any way.
 - c) Receiving or Paying a so-called 'Grease' or 'Facilitation' payment – where an employee improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway. For example: where a member of staff at an implementing partner refuses to issue the required travel authorisations without a personal payment also being made.
 - d) Nepotism or Patronage – where an employee improperly uses their employment to favour or materially benefit friends, relatives or other associates in some way. For example, through the awarding of contracts, jobs or other material advantages.
 - e) Embezzlement - where an employee improperly uses funds, property, resources or other assets that belong to Save the Children or a connected organisation or individual. For example, an employee using building contractors who have been employed to work on a Save the Children project to work on their own personal property instead.
 - f) Receiving a so-called 'Kickback' Payment – where an employee improperly receives a share of funds or a commission from a supplier as a result of their involvement in a corrupt bid or tender process.
 - g) Collusion – where an employee improperly colludes with others to circumvent, undermine or otherwise ignore Save the Children's rules, policies or guidance. For example, where an employee tries to fix the amounts of a tender in order to bring it below a certain threshold which has been set by Save the Children.
 - h) Abuse of a Position of Trust – where an employee improperly uses their position within Save the Children or a connected organisation to materially benefit themselves or any other party. For example, an employee accessing confidential material they are not entitled to or passing confidential information (such as the contents of a tender bid) to a third party.
2. All Save the Children staff and volunteers have a duty to protect the assets of Save the Children from any form of corruption. Staff and volunteers must immediately report any suspicion of bribery or corruption to their senior manager and not to anyone else. Failure to report will be treated as serious and may result in disciplinary measures being taken.
 3. Following such a report, the senior manager must then immediately report the suspicions raised to the Financial Controller (FC) and, in respect of an overseas office, additionally to their Regional Director (RD) and the Head of Global Systems and Integration

4. The senior manager, together with other relevant managers, must establish whether there are clear grounds for initiating an independent investigation, with ongoing direction from the FC (or their delegate). If so, then a formal investigation must take place using an independent third party e.g. a senior manager not associated with the individuals involved, a member of Internal Audit or an independent professional firm.
5. Other than in exceptional circumstances, and where the FC and GC have given explicit consent, Save the Children will report all apparent criminal conduct covered by this policy to the appropriate police or investigatory authorities, irrespective of whether that conduct is on the part of employees or others. As corruption law frequently extends beyond the country that the conduct took place in, Save the Children may decide to report any such conduct to the police or investigatory authorities of more than one jurisdiction. Where conduct is not reported to the police, prior approval for the failure to report must be sought and obtained from the FC and GC. When considering whether there are exceptional circumstances for not reporting matters to the local police, the FC and GC will consider factors such as the current situation within the country and the honesty and reliability of the local police force.
6. Employees' contracts of employment must enable bribery and corruption to be dealt with firmly, but fairly, under disciplinary policies. Committing any form of corruption may be considered as gross misconduct and could lead to dismissal. Any deviation from this must be documented and approved jointly by the CFO and Director of Global HR. This documentation must state why the individual was not dismissed and what disciplinary action was taken.
7. Staff must declare to their line manager any possible conflict of interest (for example, a friend or family member working for a supplier) that might leave them open to a suspicion of corruption. Where such a conflict of interest exists, the line manager should bring it to the attention of the relevant senior manager.
8. Each Country Finance Manager (CFM) must maintain a 'Gift Register' of all material gifts and any other material benefits that have been offered to employees in the course of their employment. The FC will maintain the Gift Register for UK based staff. The format of this Gift Register is that communicated by the FC. The Gift Register must be submitted by the CFM to their Regional Finance Manager (RFM) on an annual basis. It is the responsibility of each RFM to review the Gift Registers of their countries and follow up any concerns they have with the countries. Any concerns remaining must be brought by the RFM to the attention of their RD, the Head of Global Systems and integration and the FC. Gift Registers maintained in Regional Offices must similarly be submitted by the RFM to the Head of Global Systems and Integration on an annual basis for review. The Head of Global Systems and Integration and the RDs are jointly responsible for bringing any concerns to the notice of the DGP, DDGP and the FC.
9. Material gifts of any kind received by a Save the Children employee in the course of their employment must be assumed to be intended for Save the Children's benefit and must be handed in to the employee's line manager and recorded on the Gift Register. The line manager should ensure that any gift provided is used for Save the Children's benefit and, as such, the keeping of such gifts by individuals is not allowed. Any exceptions to this, e.g. where it is considered by senior management to be palpably unfair and/or that it may cause offence to the donor for a gift not to be kept by an individual and the gift, while material, is not considered extravagant (again, as with materiality, commonsense must be applied here), must be jointly approved by the relevant Country Director (CD) and CFM. Where gifts are received overseas and kept by CDs and/or CFMs then they must be jointly approved by the relevant RD and RFM. Similarly, for the RD or RFM, this would

require joint sign off by the DDGP and FC. In the UK, this would mean joint sign off by an SLT member for their team together with the FC (or UK HR Manager if within the Finance team), joint sign off by a Director together with the CFO for SLT members (or Director of Global HR if it involves the FC) and sign off by the Board for Executive Directors (via a paper to be presented as applicable at the next quarterly Board meetings).

10. Implementing partners must have included in their contract a clause requiring them to report to Save the Children and take action against any corruption which occurs in their organisation and affects the sub-grant. See [Implementing Partners Policy](#).
11. Suppliers and agents of Save the Children must act in accordance with this policy although the keeping of a Gift Register and associated rules are internal to Save the Children.

Attempted corruption is as serious as the actual acts and will be treated in the same way under this policy.

Guidance notes to policy:

- All references in the Rules to 'employees' or 'employment' should be read as including the staff of implementing partners, suppliers, agents and volunteers although, as above, the keeping of a Gift Register and associated rules are internal. Save the Children should reserve the right to terminate contracts with implementing partners, suppliers and agents if they breach these rules.
- This policy applies globally to all Save the Children staff and volunteers as they carry out Save the Children business. It also extends to any corrupt attempts by external groups or individuals (e.g., implementing partners, contractors, suppliers, donors, local authorities and beneficiaries) to steal or improperly obtain Save the Children funds or assets.