



**Community Advocacy and Awareness Trust (CRAWN Trust)**  
**ANTI-FRAUD AND CORRUPTION POLICY**  
**APRIL 2024**

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## 1. Purpose and Scope

To ensure that Community Advocacy and Awareness (CRAWN) Trust continues to have high standards of accountability, it is important that clear guidance be given to all on how fraud and corruption is being dealt with.

This policy establishes the responsibilities of staff to prevent the occurrence of fraud, as well as responsibilities for follow-up in the event fraud is suspected or occurs. The principles and definitions in this policy also extend to relationships CRAWN Trust has with external organisations and individuals (including, without limitation, contractors, consultants, sub-grantees, donors, and all relevant partners).

This policy establishes CRAWN Trusts' approach to preventing, reporting, and responding to events of fraud to protect the interests, mission, values, staff and reputation of CRAWN Trust.

CRAWN Trust has a zero tolerance for fraud and corruption and requires staff at all times to act honestly and with integrity and to safeguard the assets for which they are responsible. Fraud and corruption are an ever-present threat to CRAWN Trust's assets and reputation and is therefore an important concern for all.

This policy intends to supplement but not replace any legal provisions and government initiatives which fight against and prevent corruption in Kenya, including but not limited to the Anti-corruption and Economic Crimes Act, 2003.

## 2. Introduction

CRAWN Trust is committed to maintaining the highest ethical standards in all its activities. This policy outlines CRAWN Trust's commitment to preventing fraud and corruption within the organisation.

## 3. Definition of Fraud and Corruption

The term **fraud** describes a range of activities such as deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, intentional misrepresentation, concealment of material facts, and collusion. It involves the act of deceit of an organisation or an individual in order to obtain a personal or collective advantage, avoid an obligation or cause loss.

**Corruption** involves the act of dishonestly obtaining an advantage from a third party by abusing an entrusted power for private gain. Neither fraud nor corruption are necessarily restricted to monetary or material benefit but could also include intangible benefits such as status or information.

## 4. Responsibilities

### 4.1 Employees

All staff are responsible for:

- (a) Acting with care in the use of CRAWN Trust's assets and resources;
- (b) Conducting themselves in accordance with the principles set out in the Code of Conduct;
- (c) Disclosing actual or potential conflicts of interest
- (d) Alerting their supervisor where they believe the opportunity for fraud or corruption exists;
- (e) Reporting details immediately to their supervisor of
  - i. any suspected or actual fraud or corruption;
  - ii. any suspicious acts or events which might give rise to a suspicion of fraud or corruption; and
  - iii. assist in any investigations by making available all relevant information and by cooperating in interviews.

### 4.2 Management

The day-to-day responsibility for the prevention and detection of fraud rests with directors and managers who are responsible for:

- (a) Identifying risks to which systems, operations, and procedures are exposed;
- (b) developing and maintaining effective controls to prevent and detect fraud; and
- (c) ensuring compliance with controls

The Executive Director, Director of Finance and Administration, and in-house counsel are available to offer advice and assistance on control issues and managers are encouraged to make use of this service.

If for any reason a member of staff does not feel able to report a suspected fraud or corruption to their supervisor, a more senior manager or the Director of Finance and Administration should be informed. If they do not feel able to report suspected fraud or corruption to management or are

not satisfied that their concerns have been addressed, or If fraud is suspected on the part of or involves the Executive Director (e.g., fraud is widespread), the matter must be reported to the Chair of the Board of Directors.

## **5. Reporting and Investigating Allegations**

### **5.1 Reporting Allegations**

Employees are encouraged to report any suspicions of fraudulent or corrupt activities to their supervisor. Reports can be made anonymously, if desired.

### **5.2 Investigating Allegations**

CRAWN Trust will establish an investigation team to investigate allegations of fraudulent or corrupt activities. The investigation team will collect evidence and take appropriate disciplinary action.

## **6. Disciplinary Actions**

Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment. All associates to CRAWN Trust including but not limited to contractors and consultants who violate this policy may have their contracts terminated.

## **7. Review and Revision**

This policy will be reviewed and revised as necessary to ensure that it remains effective and appropriate.

## **8. Distribution and Training**

This policy will be distributed to all employees and relevant third parties. CRAWN Trust will provide training to employees on the policy and its implementation.

By implementing this anti-fraud and anti-corruption policy, CRAWN Trust aims to maintain the highest ethical standards and prevent fraudulent and corrupt practices within the organisation.