



The Palestinian Association for Empowerment and Local Development - REFORM

Anti-Corruption Policy Framework

**Approved by the Board of Directors of The Palestinian Association for
Empowerment and Local Development - REFORM**

I. Introduction

1. Combating fraud and corruption within REFORM is a primary responsibility of staff, including management and the Board of Directors.
2. There is a zero-tolerance policy applied to fraud and corruption involving its staff members and all relevant stakeholders. This means any individual acts of REFORM's staff and Board members that are in violation with REFORM's policies will be vigorously pursued.
3. Acts of corruption or fraud are any act or omissions whereby a member of REFORM knowingly misrepresents or conceals a fact for personal gain. Any misuses of official authority for this reason will be duly pursued.
4. Fraudulent Acts are considered misconduct and therefore REFORM members will abide by its disciplinary measures that are set in place in the administrative manual. Other measures that have not been disclosed may include financial recovery of losses and reporting to official bodies.
5. Staff members have the duty to report any and all possible cases of fraud or corruption to either their supervisor or General Manager, and in necessary cases, the Board of Directors. These reports will remain confidential.
6. REFORM is obliged to protect its staff members, volunteers and interns from acts of retaliation in cases of reporting fraud and corruption.
7. REFORM's Board of Directors and Advisory Boards are responsible for conducting intensive investigations in high level criminal cases. Alternatively, lower risk cases can be handled by the appropriate officer in charge.
8. The Financial and Administrative Officer must report all cases of fraud and corruption to the General Assembly through periodic reports and meetings; this includes cases in which fraud has not been proven but is suspected.
9. It is the responsibility of the Board to take any necessary actions moving forward.

II. REFORM's Guiding Principles

Participation

We believe that empowering social groups, especially marginalized groups, towards full participation in society is a prerequisite to improving the living conditions of Palestinians.

Transparency and Accountability

We hold that access to information is an inviolable right for every Palestinian, supporting transparency and accountability throughout society.

Ownership

We champion a needs-based approach, strengthening local capacities to lead community development.

Sustainability

We are committed to ensuring the sustainability of our interventions; based on the needs of our beneficiaries and building on their skills and talents, we empower REFORM participants to continue being active beyond our interventions.

Integrity

We foster a learning environment at REFORM that mirrors our vision of a fairer society; we seek to enhance our human and institutional capacity with the aim of ensuring effectiveness and transparency in everything we do.

III. Strategic Direction II

Enhance Good Governance and develop the public sector's responsiveness to citizens' needs.

1. Strengthen the public's capacity to participate in decision-making processes.
2. To enhance good governance within NGOs; to ease access to information and combat corruption.
3. To sensitize officials to development needs; to facilitate citizens' equal access to public utilities.
4. To provide an alternative to states bodies lack of jurisdiction in Area 'C', including Jerusalem.

IV. Purpose

The purpose of this framework is to aid staff in promoting a culture of transparency and integrity within all of its operations, by providing guidance and information to prevent and report on acts of fraud and corruption, ensuring the sustainability and credibility of the Association.

V. Examples of Fraudulent Acts

- Submitting falsified documentation on organizational and project reporting (financial and technical).
- Purposely creating a document that authorizes a non-authorized staff member to remove assets from the organization.
- Misrepresenting professional qualifications.
- Submitting falsified communication or transportation reimbursement requests; same for fake contracts or ghost employers.
- Hiring employees based on favoritism or nepotism.
- Paying employees not according to salary scale.
- Giving bonuses and other incentives to employees without proper justification.
- Improperly assisting a vendor in a procurement process or committing nepotism when selecting tenders (Procurement Manual created for this reason); Manipulating a procurement or recruitment process to ensure a certain outcome.
- Misusing REFORM's financial or material resources to benefit oneself or a third party.
- Soliciting or accepting bribes for personal gain.
- Revealing internal confidential information without proper approval.
- Participating in the recruitment process of a family member or a person with whom one has an undisclosed conflict of interest.

This list is not all inclusive. Please contact your superiors for any inquiries in this regard.