

Policy Development Guidance

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Introduction

This document outlines what we would expect to see in each type of key policy. The level of detail in the processes and procedures will depend on the size of the organisation, governance structure and type of organisation. There isn't really a one size fits all.

Anti-Fraud, Anti-Bribery & Anti-Terrorism Policy

Q. What are you looking for from our Anti-Fraud, Anti-Bribery, and Anti-Terrorism Policy?

A. We want to see that malpractice is taken seriously, staff are trained on the different types of fraud and what behaviours are and are not acceptable. It is also important to see that there are procedures and processes in place to mitigate and manage any whistleblowing or suspected malpractice.

Q. We don't have an Anti-fraud, Anti-Bribery, and Anti-Terrorism Policy. What should we provide?

A. The information that covers these areas could be found in multiple documents and are not necessarily in one document with this title. For example, process around fraud could be contained in your organisation's Procurement Policy; anti-bribery and fraud could be in the Code of Conduct or your organisation's Ethical Guidelines. Please provide the necessary documents that cover these areas.

What should be covered:

- **Are the different types of frauds clearly defined?**
- **Is there any mitigation action or expected behaviour described in the policy?**
- **Is there Anti-Fraud, Anti-Bribery and Anti-Terrorism training in place for all members of staff?**
- **Is there a whistleblowing policy in place in case of suspicion of serious malpractice or fraud?**

- How are allegations of malpractice/fraud/corruption handled within the organisation? Who is involved? What steps are taken? and which external agencies are informed and at what stage?
- How do you carry out due diligence on vetting new partners, contractors, suppliers?
- Do you carry out background checks on new staff?
- Do you run against sanction lists? If so on what portal?

Useful additional guidance can be found below:

An example Anti-Fraud and Corruption Policy can be [found here](#)

Best practice principles can be [found here](#)

Whistleblowing principles can be [found here](#)

Child Protection and Safeguarding Vulnerable Groups Policy

Q. Who is included in vulnerable groups?

A. A vulnerable group is any identifiable group of individuals that could be at higher risk of harm or exploitation or could be less likely to be able to defend themselves from harm or exploitation that results from the actions of an organisation.

These groups will depend on the context that the individual organisation operates in. They may include (but are not limited to):

- People within different age ranges, especially children and older people
- People of a particular gender and/or sexual orientation
- People with disabilities or illnesses
- People with particular religious beliefs, or none
- People with a particular ethnicity, nationality, or geographical background
- People with a particular marital status
- People who are pregnant, or have recently had or adopted children
- People with particular political views, including members of political organisations
- People who are carers for people classed as vulnerable
- People who are refugees, internally displaced persons, or affected by a humanitarian crisis
- People of a particular economic class, or members of a particular trade or profession

Q. What is protection and safeguarding?

A. Safeguarding is promoting the welfare of vulnerable groups by protecting them from maltreatment, preventing impairment of their health or development, and removing the risk of discrimination. Protection is part of safeguarding and promoting welfare. It refers to the activity to protect specific groups who are suffering, or are likely to suffer, significant harm. Effective protection is essential as part of wider work to safeguard and promote the welfare of vulnerable groups and children

Q. We don't work directly with children or vulnerable groups, why do we need Protection and Safeguarding Policies?

A. If you work with vulnerable groups, you should have a Safeguarding Policy to help ensure that your project does not expose vulnerable groups to the risk of harm, abuse or discrimination. We may request your project staff have a DBS (Disclosure and Barring Service) check, or the country equivalent. If your project is not going to work directly or even indirectly with vulnerable groups - for example if it is purely lab-based - then we will not require a Protection or Safeguarding Policy, but we may include a clause in the contract to underscore the fact that the project is not working with vulnerable groups.

Q. What if we don't have a Safeguarding Policy but will be working with vulnerable groups?

A. Some aspects of safeguarding policy information may be contained within an organisation's Code of Conduct. If not, you may want to ask your project partners if you could adapt their policies, if they have an appropriate good quality policy. Alternatively, we would highly recommend enlisting the services of an organisation called [Keeping Children Safe](#) who specialise in helping organisations improve their child protection policy. For a safeguarding vulnerable groups policy, they follow a similar policy structure.

Q. What are you looking for from our Safeguarding Policy?

A. We expect to see a robust understanding of what vulnerable group exploitation, discrimination and abuse is, in its many different forms, and that the organisation is doing everything in its ability to identify potential vulnerable groups and ensure their safety and wellbeing.

This includes (but isn't limited to):

- **Running appropriate recruitment processes**
- **Carrying out due diligence**
- **Ensuring that the organisations' staff, volunteers or consultants receive robust training on Safeguarding principles and that they are aware and committed to follow the procedures and processes in place if there is an incident or a suspected incident**
- **Best practice reporting procedures in place and clear guidance for staff, volunteers or consultants and an outline of steps and persons involved in the case of investigation**

Useful guidance to develop a Protection and Safeguarding Policy can be found here:

Guidance on how to write a Child Protection Policy;

www.nspcc.org.uk/preventing-abuse/safeguarding/writing-a-safeguarding-policy/

<https://www.nspcc.org.uk/globalassets/documents/information-service/factsheet-writing-organisational-child-protection-policies-procedures.pdf>

Security Policy

Q. Why do we need to provide a Security Policy?

A. We will request this document if the country you are working in is deemed 'Very High Risk' to 'High Risk' and we take these recommendations from Save the Children's internal country risk register. This is currently listed as:

Very High Risk	High Risk
Afghanistan	Bangladesh
Central African Republic	Burundi
DRC (East)	Chad
Iraq (Central/South)	Colombia
Libya	DRC
Mali (North)	Egypt
Niger (Southeast)	El Salvador
Nigeria (North)	Guatemala
Pakistan	Haiti
Somalia	Honduras
Syria	Iraq (North)
Ukraine (Donbass Region)	Kenya (North East)
Yemen	Lebanon
	Mali
	Myanmar (Rakhine/Sitwe)
	Niger
	Nigeria
	Palestine
	Papua New Guinea
	Philippines
	South Sudan
	Sudan (Blue Nile/Darfur/ South Kordofan)
	Thailand (South)
	Tunisia
	Turkey
	Venezuela

Q. What should be covered in a Security Policy?

A. The organisation should be committed to minimising safety and security risks to staff and ensuring staff are given training, support and information to reduce their risk exposure.

- **Is there a person for each country identified as the security focal point?**
- **Is there a security manual adapted to the country of operation?**
- **Does each person travelling receive a security and safety briefing?**
- **Does the organisation use and maintain facilities in accordance with applicable safety and security local requirements?**
- **Does the organisation prohibit possession of firearms or other weapons in their premises and vehicles?**
- **Does the organisation establish and maintain an effective, secure communications plan?**
- **Does the organisation ensure that all safety and security incidents are reported within 24 hours?**
- **Does the Security Policy include Staff Hibernation, Evacuation and Relocation Procedures?**
- **Does the organisation have any Abduction and Kidnapping Policies and Procedures?**

Useful link for additional guidance:

www.iosh.co.uk/withoutborders

Procurement Policy

Q. What is a Procurement Policy; what should it cover?

A. Your Procurement Policy should guide how you go about buying goods or services. We are keen that you comply with best practice procurement process. In part because this is a good way to prevent fraud or bribery, but it is also a good way to ensure that you get value for money when procuring goods or services.

We will be interested to understand whether you seek more than one quote before purchasing, and whether you openly tender for suppliers. A best practice policy would include a clear threshold table indicating at what purchase value different processes will kick in. It may include standard templates for key steps in the process. Above all, it should clearly outline the steps that must be followed before goods or services can be procured.

What we will be looking for;

- **Who authorises procurement, and at what levels?**
- **Is the Procurement Policy in line with donor requirements?**
- **Are the minimum standards of ethical procurement carried out (also by partners, tenderers, candidates and contractors)?**
- **What due diligence is carried out on supplier and contractors?**
- **When purchases are made, is more than one price quote sought before buying?**
- **Above what level are price quotes sought?**
- **Is there a clear threshold table and standard template in place for each step of the purchase process?**
- **Does the organisation keep an asset register and transaction list as standard?**
- **Are there clear procedures to archive purchase files?**

Useful links for additional guidance:

Procurement Objectives & templates

www.nextlevelpurchasing.com/news/purchasing-articles/procurement-policy-template

Financial Management Procedures

Q. What are Financial Management Procedures and why do you need these?

A. We ask for these procedures in order to understand how robust your organisation is at managing its finances, and therefore the risk involved in granting to you. We, and you, may be audited, and we are keen to minimise the risk of issues being raised by a potential audit, or funds being disallowed. Having solid financial management processes is a good way to protect against fraud.

We will be keen to understand your Cash Management Policy, the process you undertake for any bank reconciliations, any software you use, and how transactions are identified through the finance system. We will want to understand whether you have clear segregation of duties, whether there is a scheme of delegation. We will also be keen to understand what processes you follow for monitoring spend on the project.

What we will be looking for in a policy;

- **Is there a robust Cash Management Policy?**
- **Is there a monthly cash and bank reconciliation?**
- **Is there a clear segregation of duties between those processing and authorising transactions?**
- **Is there a scheme of delegation for expenditure authorisation?**
- **What is the accounting software?**
- **Do outgoing invoices have a unique code?**
- **Are transaction lists easily auditable?**
- **Are there any rules on budget management and reviews? (e.g. variance analyses reviewed periodically)**
- **Are there internal audits?**
- **Is there an annual external audit? How are recommendations followed up?**
- **Are there any specific rules for transferring money to external partners?**

Useful link for additional guidance;

knowhownonprofit.org/organisation/operations/financial-management/procedures

Other Policies

Q. I still require guidance on other policies required

A. If you have any questions about other policies, please contact Elrha's Grant Operations & Finance Unit at grants@elrha.org