

Reasons for the Anti-Fraud and Anti-Corruption (AFAC) Policy Update

To address in
policy update

Applicability and scope

Management accountabilities
unclear for control remediation

Under-reporting to
Office of Inspections
and Investigations (OIGI)
and management

Inconsistent audit trail for internally
reported cases

AFAC Policy Improvements

Strengthened Management Accountability

Clarity and completeness:

- Clearer definition of prohibited practices
- Inclusion of theft, money laundering and financing of terrorism

Management responsibilities:

- Clear role of Office/Division Director

Escalation of material cases:

- Escalation of material suspected cases by the Director
(in line with risk escalation responsibilities outlined in the Enterprise Risk Management (ERM) policy)

Timely remedial action:

- Director, with support from ERM, can address any control issues promptly

Edits to AFAC Policy draft since the Informal Consultation

Edits since Informal Consultation

Strengthen

- the emphasis on 'zero tolerance for inaction' (*para 4*)
- the action in the recovery phase from 'may' seek recovery to 'will attempt, where feasible, to' seek recovery (*para 63*)
- the notion that reporting (by Donors and also Cooperating Partners (CPs)/Vendors) to the Office/Division Director is only if appropriate (*para 50, 51*)
- mandatory OIGI reporting: emphasize that the Office/Division Director must firstly ensure any allegation reported to him/her has been reported to OIGI (*para 53*)

Clarify

- that the policy also refers to non-financial fraud (*para 11a*)
for example: fraudulent statements may be of a financial or non-financial nature

AFAC Policy Update – Roll-out and Engagement Plan

JUNE 2021

- AFAC Policy is posted on the internal and external WFP sites
- An ED Circular is sent to ALL to notify of policy update

JULY 2021

Planned communication and actions will include:

- A global ED video message
- A two-part companion guidance document
 - **Level I:** aid to all employees on reporting of fraud and corruption
 - **Level II:** aid to Directors for escalation of *material* cases (if reported to Director)
- Engagement with all six regional bureaux and certain high-risk country offices
- Use of the Risk and Compliance Advisors (RCA) network around the globe to support dissemination and implementation
- Increase of Global AFAC Specialist team size from three to five (dependent on funding)
- Inter-agency sharing on best practices and consistent standards in United Nations Country Teams (UNCTs)
- **Training update for all staff and senior management:**
 - eLearning *mandatory* AFAC course and seminar-based training