



Aid Diversion & Reporting Policy

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Approved on			
Responsible	Programmes	Review Scheduled on	1 July 2020

1. Introduction

Human Appeal is an incorporated UK charity working across the globe to strengthen humanity's fight against poverty, social injustice and natural disaster, through the provision of immediate relief and establishment of self-sustaining development programmes. Our vision is to contribute to a just, caring and sustainable world free of poverty. Human Appeal does this by raising money to fund immediate and long-term sustainable solutions, and empower local communities.

2. Policy Statement

Human Appeal strictly observes the core principles of independence and impartiality, and respects the human rights of all people regardless of background and creed. We rigorously manage our projects from start to finish ensuring that our funds and resources are being used effectively and entirely for their intended purpose of alleviating poverty and supporting those in need. Human Appeal's work spans different geographical locations, and the charity understands the risks associated with the delivery of high value aid in fragile contexts. These risks are much higher in countries and regions, where there is a breakdown in law and order, high criminality, and/or where armed actors and proscribed groups are operating. Hence, aid delivery is at risk of diversion due to pilfering, armed robbery, looting, and the actions of armed actors, whether proscribed or not.

3. Policy Objective

3.1. Human Appeal fully appreciates that programmes, whether implemented by its staff or partners may be within close geographical proximity of proscribed groups. Human Appeal operates within the legal boundaries permitted when it comes to both the work undertaken and how to go about this. Human Appeal takes all steps to ensure that funds and resources do not fall into the hands of proscribed groups, and is committed to take all steps and measures to ensure this core principle of its work is a priority.

3.2 Human Appeal has a number of measures that support its commitment to prevent aid diversion:

3.2.1 Risk assessment is undertaken prior to (and during) any deployment to high-risk countries and countries where it is known that proscribed groups operate. In addition, there is also a higher level of diligence on countries/areas where there is poor access or communication, which could lead to the likelihood of aid diversion.

3.2.2 Due diligence carried out in high-risk countries and Implementation of minimum corporate standards in low risk countries.

3.2.3 Any breaches of this policy are reported under the organisation's Serious Incident Reporting mechanism. All incidents related to breach of policy and/or aid diversions are to be reported to the director of programmes, who is the appointed internal officer (or the Programmes Manager in his absence).



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- 3.2.4 Training to designated staff and partners and all related parties on legal aspects and international law.
- 3.2.5 Training to staff and partners and all related parties on Human Appeals policies and measures put in place to prevent aid diversion and other forms of financial abuse.
- 3.2.6 Continually evaluate to make sure Human Appeal's work through its staff or Partners remains
- 3.2.7 Compliant with UK law and relevant laws of the jurisdiction in which it operates.
- 3.2.8 Continually evaluate to make sure Human Appeal's work through its staff and Partners remains compliant with our anti-fraud, corruption, and anti-bribery policies.

4. Roles and Responsibilities

All staff, volunteers, consultants and other stakeholders are responsible for knowing the contents of this policy and its procedures.

5. Policy Provisions

- 5.1. The following steps will be taken by programmes staff on the ground in order to prevent aid diversion:
 - 5.1.1 Assess the local context for corruption risks and complete risk assessment and analysis.
 - 5.1.2 Identify and engage local elites in fighting corruption using, for example, participatory and acceptance approaches.
 - 5.1.3 Ensure culturally appropriate beneficiary participation throughout the programme cycle. Also, ensure a safe complaint mechanism so beneficiaries can report aid blockages.
 - 5.1.4 Train staff in how to respond to coercion and intimidation, blockage by local elites or authorities, and to requests for payments for access to beneficiaries.

6. Sanctions

It is a mandatory requirement that **all** incidents of aid diversion or loss of assets and funds shall be reported via the **Serious Incident Reporting** mechanism. Failure to comply with this requirement may result in disciplinary action and summary dismissal.

7. Policy Review

The Aid Diversion & Reporting policy was prepared by the Programmes function at Human Appeal. It will be reviewed on an annual basis to ensure continuing appropriateness.