MA Cheat Sheets: Fraud

UNDP issued the UNDP Guidelines for Engagement with NGOs under Country Based Pooled Funds in late 2016 and rolled these out in 2017. This was part of an effort to harmonize implementation approaches with those of the OCHA Operational Handbook.

To complement the Guidelines, UNDP has developed MA Cheat Sheets to provide additional practical information on selected subject matters. There are 9 available Cheat Sheets on the following topics: MA Structure and Performance Review * Capacity Development * Fraud * HACT * Asset Management * NEX Advance * MA and ATLAS * Micro-assessments/Spot Checks/Audits * Results Architecture. These can be found here.

UNDP’s Fraud Framework
UNDP has zero tolerance for fraud and corruption, meaning that UNDP staff members, non-staff personnel, vendors, implementing partners and responsible parties including NGOs should not engage in fraud or corruption under any circumstances.

UNDP has issued an anti-fraud policy which all UNDP staff and non-staff personnel, vendors and partners should be familiar with. UNDP is committed to preventing, identifying and addressing all acts of fraud and corruption in UNDP activities, through raising awareness of fraud risks, implementing controls aimed at preventing and detecting fraud and corruption, and enforcing the anti-fraud Policy.

This Policy applies to all activities and operations of UNDP, including projects and programmes funded by UNDP as well as those implemented by UNDP. This Policy aims to prevent, detect and address acts of fraud and corruption.

MA Teams have a responsibility to raise awareness of the anti-fraud Policy with NGO partners, and reiterate their duty to report instances of fraud and corruption.

Where UNDP is not the Fund Manager, it will be important to understand what the fraud requirements and processes are in which the Fund Manager operates.

When fraud is suspected or reported, this should always be discussed the Fund Manager and CO senior management.

Training of IPs on Fraud as part of the regular capacity development activities will support a better understanding of what constitutes fraud, mitigation measures that can be put in place as well as how to report suspected cases of fraud.

Regular follow up with NGO partners through a quarterly fraud reporting requirement will ensure they continuously reflect and focus on fraud detection and prevention throughout the lifecycle of the project.

The establishment of an email address that is solely used for the submission of the quarterly fraud report and to report fraud to the MA and the Fund Manager is encouraged. Access to the inbox should be limited to ensure confidentiality.

Spot checks should also be used to verify the existence of a Fraud policy and clear understanding of fraud mitigation requirements. Where applicable, spot checks could be used to strengthen the capacity of the NGO partner when it comes to UNDP’s Policy against Fraud.

The Country Office in Sudan has developed a very comprehensive Fraud Mitigation Toolkit for NGO Partners which can serve as a basis for any MA team looking to strengthen an existing system or set up a new one.

Relevant Policy Documents:
- UNDP Policy against Fraud and other Corrupt Practices English French
- UNDP Guidelines for Engagement with NGOs under Country Based Pooled Funds – p. 11 (French version)
- Sudan Fraud Mitigation Toolkit for NGO Partners – can be found on the MA Yammer page [here].
- A mandatory anti-fraud e-training module – currently under development and expected to be rolled out in Q2/Q3 2018

Best practices and lessons learned with regards to Fraud:
- All team members of the MAU have to be fully versed on the steps to take when fraud is suspected or reported. This will ensure that they can inform and advise the Fund Manager on how to proceed.
- Mau team members have an obligation to report all incidences of suspected fraud to the UNDP Office of Audit and Investigations using any of the reporting channels indicated in the anti-fraud policy. The established reporting channels enable suspected cases of fraud to be reported confidentiality.