



**U.S. Agency for International Development  
OFFICE OF INSPECTOR GENERAL**

**U.S. Department of State  
OFFICE OF INSPECTOR GENERAL**



# **COMPLIANCE AND FRAUD PREVENTION**

**A POCKET GUIDE FOR PROGRAM IMPLEMENTERS**

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*Clear separations of duties, education about the consequences of fraud, and good internal policies encourage a culture of compliance. They can also serve as a fraud deterrent and limit the impact that a fraud scheme could have on a project.*

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*It can be difficult for implementing partners to verify sub-partner data in a remotely-managed project. For this reason, it is especially important to verify that sub-partners have the capacity and internal controls necessary for the project.*

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*Procurement fraud is a risk in areas where security concerns can be used to justify a non-competitive procurement process.*

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*A strict quality control process can ensure that the items provided to beneficiaries are the same items that were purchased. It can also help achieve program objectives by ensuring that beneficiaries receive good quality, safe, and useful aid.*

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*Diversion, theft, and product substitution are difficult to prevent and identify in cross-border programs. However, there are mechanisms an implementing partner can institute to reduce these risks and identify when a problem has occurred.*

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*It is important that beneficiaries have a way to report fraud, waste, or abuse to the implementing partner. Beneficiaries can use hotlines to report issues including dissatisfaction with an aid package or instances of distributors soliciting bribes.*

## REPORTING FRAUD

*Implementing partners should have a clear understanding of what to report to OIG and when they should report it. OIG employs trained investigators able to identify whether there is fraud, waste, or abuse in a program. Identifying and eliminating fraud as soon as possible is essential to a program's success.*

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# INTRODUCTION



The USAID and Department of State Offices of Inspector General have provided this pocket guide to assist implementing partners in their response to the Iraq/Syria humanitarian crisis. OIG compiled this handbook from trends identified in investigative experiences and meetings with USAID implementing partners across the region. This guide is designed to be used as a quick reference and may be useful for the DART's future site visits with implementing partners or sub-partners. Upon request, OIG can provide more detailed information on the subjects included within this guide.

Corruption takes many forms, including financial and non-financial crimes such as procurement fraud, nepotism, bribery, embezzlement, theft, or product substitution, among others. Corruption in humanitarian assistance can be particularly egregious when it diverts resources from the most vulnerable populations. We can improve the efficiency and quality of USAID programs by remaining vigilant against fraud and working to eliminate corruption, waste, and abuse from humanitarian work. It is particularly important to remain vigilant in areas where security measures are instituted to protect staff and normal procedures are circumvented due to the immediate demands of a crisis.

Vigilance can include fraud awareness briefings, which the OIG provides as frequently as possible. It can also include regular interviews with implementing partners about internal controls and best practices used by other partners in the area.

Fraud often goes undetected in non-forensic annual audits. However, USAID OIG employs investigators, auditors, and analysts trained to detect fraud. OIG also recommends local audit firms upon request. If you are aware of any instances of fraud, waste, or abuse, contact the OIG Hotline. All complainants are offered confidentiality. For more information on fraud reporting requirements, see the final page of this handbook.

## **HOTLINE E-MAIL**

[ighotline@usaid.gov](mailto:ighotline@usaid.gov)

## **COMPLAINT FORM**

<https://oig.usaid.gov/content/oig-hotline>

## **TELEPHONE**

+1-202-712-1023 or 1-800-230-6539

## **MAIL**

USAID OIG Hotline

P.O. Box 657

Washington D.C. 20044-0657

# HOW TO USE THIS HANDBOOK

## Questionnaire

*If you are a USAID employee, use the first section as a **questionnaire** to identify strengths and deficiencies in an implementing partner's internal controls. It is best to visit the partner's offices and directly ask all listed questions in person. Note all instances in which the implementing partner is unable to provide a response. If you are an implementing partner employee, use this section to self-evaluate your policies and procedures. Record the responses for comparison with best practices and red flags (below).*

## Best Practices

*Use this section to compare the questionnaire responses with **best practices** used by implementing partners operating in Turkey, Jordan, Syria, and Iraq. The listed best practices were developed in response to the specific challenges present in cross-border humanitarian operations. Items in this section are provided a check box. Add the number of check boxes together to quantify potential risk factors faced by the implementing partner. The more items that are checked, the lower the risk of fraud. It is important to remember, however, that fraud can occur under any circumstances, including favorable ones.*

## Red Flags

*The last section lists **red flags**. These are factors that, if mentioned by the implementing partner, should raise concerns. If you are a USAID employee, use the responses to evaluate possible deficiencies in the implementing partner's internal controls. Discuss ways in which the implementing partner can improve any identified red flags. If you are an implementing partner employee, use the results to identify areas for improvement in your policies and procedures. This list should not be taken as a comprehensive list of high risk behavior. If you identify behavior that you feel is indicative of fraud and that is not on this list, feel free to share this information with OIG.*



# INTERNAL POLICIES

## Questionnaire

- What fraud prevention training do you provide your staff? How often?
- What deviations from organizational internal control policies have been authorized for your country office? Why?
- What internal controls do you employ to identify corruption, fraud, and theft?
- What policies do you have for petty cash handling? Under what circumstances do staff handle cash and how do you prevent staff from absconding with it?
- Do you have a conflict of interest policy? Are staff required to update their declared conflicts of interest any time a new one may arise? Do you have a clear idea of what constitutes a conflict of interest?
- How do you vet grantees, partners, beneficiaries, and employees? Do you collect references and conduct security checks?
- How have you ensured there is a separation of duties between procurement, finance, compliance, quality control, and program staff?



- How do you handle allegations of fraud? Do you have a procedure for internal assessments?
- Do you share information with other USAID partners about vendors, sub-partners, and employees involved in instances of fraud?

- ☐ Fraud awareness training is required annually. Procurement, finance, and logistics staff have additional requirements.
- ☐ There is a confidential reporting mechanism for employees to make complaints directly to headquarters or an external entity.
- ☐ Employees are required to complete and update conflict of interest forms annually and whenever there is a change in an employee's contacts or financial interests. Family names are compared with vendor names, beneficiaries, and new hires.
- ☐ Staff coordinate with other implementing partners to gather references for employees and vendors. It also performs regular OFAC and SAMS checks.
- ☐ Your organization believes it is important to have good lines of communication between country, regional, and HQ staff. Regional and HQ staff have visited every country office and country staff feel they can report problems to regional or HQ supervisors.

## Red Flags

- Your organization does not anticipate fraud and believes kickbacks, collusion, and theft are rare.
- For security or reputational reasons, your organization claims it cannot share information with other partners about corrupt staff, vendors, or sub-partners.
- Your organization has been operating in the area for several years and continues to have a number of waivers and deviations from normal policy.
- HQ or regional staff have never visited the country office.
- Your organization does not provide conflict of interest or anti-fraud training or materials.



# SUB-PARTNER MANAGEMENT

## Questionnaire

- How do you ensure sub-partners don't bill your organization for work also billed to another USAID partner or donor? Do you know which sub-partner staff and programs are also funded by other donors?
- How do you verify the existence and capacity of sub-partner employees and facilities?
- How do you verify that the sub-partner's expenses are allowable and reasonable?
- How frequently do you visit the sub-partner's facilities and distribution sites? Do you do so unannounced?
- Have you met with your sub-partner to discuss its internal controls?

## Best Practices

- ☐ You contact other NGOs for reference checks and (if they share a sub-partner) compare charged costs.
- ☐ You examine supporting financial documents to ensure signatures are unique and prices are reasonable.
- ☐ You verify the existence of sub-partners through site visits, research and document reviews.
- ☐ You coordinate with sub-partner HR staff to ensure your organization is not making salary payments to ghost employees or staff members no longer employed by the sub-partner.
- ☐ Your organization uses a third party to randomly verify beneficiaries received the proper quality and quantity of aid and sub-partner staff received full salaries.

## Red Flags

- You believe the sub-partner is the only organization in the area with access.
- You do not conduct random site visits at your sub-partners' offices, warehouses, clinics, etc.
- Your sub-partner has no fraud reporting mechanism for beneficiaries

# PROCUREMENTS

## Questionnaire

- What procurement process do you use? What occurs in each step of the process?
- What documentation (ie. registration, references) do you require in a bid package? Do vendors create the bid sheet themselves, using their own letterhead and format?
- Do you incorporate quality control in the bid evaluation process? Do you request that vendors submit samples? How do you ensure this process is not biased?
- Have any emergency waivers been granted to your organization's normal procurement standards? Why? For how long?
- How do you ensure you are receiving fair market value for goods and services? Do procurement staff conduct market research?
- If you use a preferred vendors list, how do you select the vendors? How frequently is it updated? Does the same person who works on the vendor list also solicit bids, conduct bid analyses, and perform vendor site visits?
- How do you verify the existence and capacity of vendors? If you conduct site visits, how do you prevent procurement staff from regularly visiting the same vendors?



- Do you keep bid samples with the full procurement files? If not, why?
- What internal controls does your organization have to prevent collusion between staff and vendors?
- Who sits on the bid opening committee and does it utilize a rotation?



# PROCUREMENTS CONTINUED

## Best Practices

- ☐ You conduct reference checks and site visits of competing vendors to verify their existence and capacity.
- ☐ You publically announce tenders as frequently as possible. If you use a preferred vendor list, you frequently update the list through open competition.
- ☐ You frequently conduct market research for goods and services. Staff compares bids to researched prices in an effort to prevent overbilling.
- ☐ You include a hotline number and anti-kickback disclaimer on bid solicitation forms.
- ☐ Bids submitted from vendors are evaluated for common contact information, headers, and employees.
- ☐ All bid samples are kept with the full procurement records for three years after the program ends.
- ☐ Staff only collect bids and correspond with vendors via official phones, computers and email accounts.



## Red Flags

- Your organization has a high threshold for publically advertised procurements.
- Your organization frequently uses sole source waivers and frequently justifies procurement decisions with subjective product quality or capacity reasons.
- Staff collects bids in person from the same vendors without witnesses or rotation.
- Procurement staff solicit tenders with very short response times or specifications such that only a specific vendor could win the contract.
- You select vendors based on quality but do not keep bid samples for later review.
- Your quality control process is based on contract specifications and not the bid sample.

# QUALITY CONTROL

A rigorous quality control process ensures the items you procure for distribution are high quality. It can also help identify and deter product substitution. Quality control teams ideally utilize an unbiased and quantifiable evaluation process and include technical experts independent from the procurement department.

Conducting market research and scored evaluations of samples will determine whether items are high quality and fairly priced. Item quality can be verified before distribution through a number of actions, to include weighing each item in an NFI or food kit, unzipping a mattress cover to inspect the filler, inspecting a larger sample of items before delivery, and comparing delivered items to samples provided during the bid process. Item quality can be verified after distributions through beneficiary feedback mechanisms. Including contact information and an inventory list in each kit allows beneficiaries to notify you when a problem arises.

Small differences in the quality of each item can be a difference of pennies or dollars. However, this cost can amount to thousands of dollars when items are purchased in bulk. Writing detailed contract specifications based on the bid sample can help protect your organization.



A vendor's sample wooden spoon (right) and the wooden spoon the vendor delivered to the partner's warehouse (left). The delivered spoon was unfinished and visibly smaller than the sample.



A vendor's sample teapot (left) compared to the teapot it delivered to the implementer's warehouse after winning the contract (right). The provided teapot was smaller and had no heat rings on the bottom.



A vendor's sample bowl (right) compared to the bowl it delivered to the implementer's warehouse (left). The top of both bowls met specifications but the bottom of the delivered bowl was smaller than the sample.

# TRANSPORTATION AND DISTRIBUTION

## Questionnaire



- What monitoring and evaluation systems do you utilize to verify distributions?
- In cases of equipment (ie. generators or solar panels), do you utilize serial numbers to track and verify item locations? In cases of pharmaceuticals, do you track items by QR code?
- How do you determine beneficiary eligibility? Does anyone verify that beneficiaries are eligible?
- How do you utilize technology as an monitoring and evaluation tool to ensure aid reaches beneficiaries?
- How is the transportation and distribution process documented? Does anyone review these documents for fraudulent entries (such as fake signatures on distribution documents)?

## Best Practices

- ☐ Distributors are required to take geotagged and timestamped photographs of distributions.
- ☐ Shipments are electronically tracked and inventory lists are current and detailed.
- ☐ Items are inspected at the time of delivery by different staff than those who ordered the items.
- ☐ You do not pay drivers or distributors until goods are received at the intended destination.
- ☐ You have hired third party monitors to conduct site visits and verify distributions.
- ☐ You employ in-house monitors in a separate monitoring department.

## Red Flags

- You believe you cannot implement many monitoring and evaluation safeguards, like site visits and video recorded distributions, due to security.
- You have no capacity to operate in an area without a sub-partner.

# SEXUAL EXPLOITATION & ABUSE

## Questionnaire - part one

- Does your organization have a written policy and an associated training program for staff and beneficiaries related to the prevention, detection, and reporting of and response to allegations of sexual exploitation and abuse (SEA)?
- Does your organization have a policy addressing the propriety of program staff or volunteers having sexual relationships with beneficiaries?
- If these policies exist, do they apply to sub-contractors and sub-awardees? As well as other supporting vendors, volunteers, day laborers, interns, etc. ?
- Does your organization have an established reporting mechanism (hotline, help desk, mobile team, complaint box, etc.) allowing staff to report allegations of fraud, trafficking in persons (including procurement of commercial sex), and SEA?
- Does your organization have a reporting mechanism immediately accessible to beneficiaries allowing them to report these issues without the knowledge of field staff who may be involved in the misconduct? How are beneficiaries made aware of this? If a reporting system is in place, does it have more than one way to report (e.g. in-person, complaint drop-box, phone, etc.)?
- Does your organization have policies requiring personnel authorized to conduct medical examinations to be clearly identifiable to beneficiaries? Has this information been communicated to beneficiaries? Are beneficiaries given the option to have a nurse or third party in the room for medical examinations?
- Does your organization properly vet new staff and volunteers to ensure they have no previous history of committing fraud, trafficking in persons or SEA? Does your organization have a policy requiring reference checks with a minimum of two previous supervisors?
- When your organization is planning to terminate an employee due to fraud, involvement with trafficking, or SEA, do you provide the details to USAID and OIG?
- If your organization channels humanitarian assistance through (or with the assistance of) military, government security forces, or non-armed government actors (teachers, doctors, community leadership, etc.), is there a plan for responding to allegations of fraud, trafficking, or SEA involving these entities?



# SEXUAL EXPLOITATION & ABUSE

## Questionnaire - part two

- If your organization channels humanitarian assistance through (or with the assistance of) military, government security forces, or non-armed government actors (teachers, doctors, community leadership, etc.), is there a plan for responding to allegations of fraud, trafficking, or SEA involving these entities?
- Does your organization include representatives of from a cross-section of the community including men, women and children (if appropriate), the elderly, persons with disabilities and vulnerable individuals in the beneficiary selection, distribution, post distribution monitoring, and beneficiary feedback phases of programming? Is this representation gender-balanced?
- Does your organization have clear policies ensuring beneficiaries (including children) are not unnecessarily placed into high-risk one-on-one type situations where fraud, trafficking, or SEA issues could arise unwitnessed?
- Does your organization have a Code of Conduct that explicitly prohibits sexual exploitation and abuse, fraud and trafficking? What efforts are made to ensure that both staff and beneficiaries are aware of the contents of the Code of Conduct?
- If there is a Code of Conduct, are there processes in place to ensure staff read it and take mandatory training associated with it? Is the Code of Conduct posted throughout offices, in project vehicles and project sites?
- Are key SEA prevention messages posted on-site and made very clear for beneficiaries? Are office hours posted and monitored so that beneficiaries are not asked to return in the evening when no one is around?
- In each instance where your organization is working with extremely vulnerable populations (including those with limited mobility or in detention), have you developed context-specific plans to ensure these beneficiaries are aware of their rights, the code of conduct for your staff, and ways to report allegations of fraud, trafficking, and SEA? In these environments, do beneficiaries have more than one way to report these issues safely?
- Does your organization have any investigative capacity, particularly with individuals trained in investigating SEA?



# SEXUAL EXPLOITATION & ABUSE

## Best Practices

- ☐ Commit to proactive and continual engagement with beneficiaries, community members and project stakeholders to monitor for issues of SEA and trafficking in persons (including procurement of commercial sex).
- ☐ Train program staff to understand their role in the implementation and enforcement of internal policies in all program activities.
- ☐ Advocate and educate staff and stakeholders on SEA and codes of conduct.
- ☐ Identify program gaps in preventing SEA, develop targeted interventions, and report abuses in a timely manner through the required channels.
- ☐ Project staff ask protection related questions to beneficiaries during post-distribution monitoring activities. For example, "Did you feel safe when receiving assistance? Were you ever asked to exchange anything in return for this assistance? Were you treated with respect? Do you know how to make a complaint? Would you feel comfortable making a complaint?"
- ☐ Signs are posted throughout project sites stating that assistance is free and that beneficiaries should not be asked to give anything in exchange for it. Additional signage should explain how to file a complaint if a beneficiary feels unsafe.

## Red Flags

- The implementer staff are unaware of their own reporting mechanisms and responsibilities to receive complaints and address allegations or there is no feedback mechanism in place at all.
- The implementer has never received an allegation of sexual exploitation, abuse, or child endangerment and/or has no policy to address these complaints. SEA prevention and detection measures may not be taking local context into account to identify cultural barriers to reporting.
- The implementer has received numerous SEA/misconduct and endangerment allegations while finding no concrete evidence to sufficiently prove or disprove them.

# DIVERSIONS & MATERIAL SUPPORT TO ARMED GROUPS AND TERRORIST ORGANIZATIONS

## Questionnaire

- Does your conflict of interest declaration by employees cover any affiliation to armed groups by themselves or direct family members?
- Do you vet or conduct due diligence related to armed group affiliation by vendors, sub-awardees, or employees?
- Do you coordinate with other humanitarian actors to determine shared challenges and threats in the operating environment?
- Do you take steps, such as negotiating with local authorities, to ensure non-interference by these armed groups?
- Does your organization deal with administrative bodies directly related to, or controlled by, armed groups?
- Do your distribution, verification, or monitoring teams attempt to determine if beneficiaries are affiliated with armed groups?
- Do you have a third-party monitor who is able to freely and fully monitor programs in these areas?
- Do you take steps to avoid having armed groups derive reputational benefit from any assistance provided?

## Best Practices

- |  |  |
|--|--|
| <input type="checkbox"/> Negotiate with local governing bodies to ensure non-interference.   | <input type="checkbox"/> When dealing with local governing bodies, all NGO staff document how each one is connected to armed groups and/or terrorist organizations, if they are.                                   |
| <input type="checkbox"/> Expand mandatory conflict of interest declarations by sub-awardees and employees to include armed group / local authority affiliations by themselves and direct family members. | <input type="checkbox"/> Develop an independent, secure hotline to field anonymous complaints.   |
| <input type="checkbox"/> Have separate distribution, verification, and monitoring teams, with separate reporting lines.  | <input type="checkbox"/> Engage a trusted third-party monitor.   |
|  | <input type="checkbox"/> Do not allow armed groups to claim credit or brand humanitarian assistance with their organization name, or use letters with official donor or NGO letterheads in their public relations. |

## Red Flags

- Eligible sub-awardees or vendors are limited to those who have formal or informal authorization from armed groups or their representatives.
- Employees and third-party monitors are regularly threatened or detained, or accompanied by members of armed groups during their activities.
- Local governing bodies and/or NGO employees resist or attempt to delay increased monitoring and/or beneficiary verification exercises.
- Armed groups and/or local governing bodies express keen interest in having certain names added to beneficiary lists.
- Beneficiary receipt forms or other documentation have similar handwriting or seem doctored.

# FEEDBACK MECHANISMS

## Questionnaire

- Does your organization have a feedback mechanism for beneficiaries, staff, and sub-partner staff? (i.e. via telephone, email, or mobile applications like Whatsapp or Viber)
- How is this feedback mechanism advertised? How can beneficiaries find this contact information?
- Is the feedback mechanism staffed by people involved in beneficiary selection, procurement, logistics or distribution?
- How do the beneficiaries know the precise quantity and quality of items they are supposed to receive, in order to identify when there is a problem?

## Best Practices

- ☐ Hotline contact information is advertised on invoices, equipment donated to Local Councils or clinics, banners hung at distributions, on distribution documents, and on aid boxes, bags, or vouchers.
- ☐ You hold pre-distribution discussions with beneficiaries to discuss what they should receive and how eligibility is determined.
- ☐ Aid packaging has individualized serial numbers or color-coded dots to indicate when and where it was distributed.
- ☐ Descriptive itemized lists and photographs of NFI or food kit contents are provided inside aid packaging.



## Red Flags

- Your organization does not have an independent beneficiary feedback mechanism.
- There is no way for staff at your organization or your sub-partner to report complaints to personnel outside of their immediate supervisors.
- You are not familiar with technology and how it can be used in humanitarian response programs.

# REPORTING

## Questionnaire

- What is your process for reporting complaints to USAID OIG? How do you decide what to report and when to report it?
- What is your process for evaluating an incident of fraud/theft/corruption?
- How do you ensure problems and complaints are communicated expeditiously between the field office and headquarters?
- Have you ever reported an allegation or incident of fraud to USAID or USAID OIG?
- Who in your organization is able to communicate potential instances of fraud to USAID OIG?

## Best Practices



- ☐ You have an institutionalized process for reporting incidents and allegations to USAID and OIG.
- ☐ You have an interest in determining the extent of a fraud, not just whether it occurred.
- ☐ You have a dedicated person responsible for preliminary investigations and compliance.
- ☐ Your organization reports allegations to every potentially impacted donor.

## Red Flags

- You have never received an allegation of fraud.
- You fire staff or take action without notifying USAID or OIG of the incident.
- Previous incidents have not been reported expeditiously.
- Your organization conducts its own internal investigations of fraud or theft-related incidents without notifying USAID or OIG.
- Your organization has conducted numerous fraud investigations relating to a single project while finding no concrete evidence of fraud.

# AFTER FRAUD IS REPORTED

## 1. Initial Notification

When a USAID implementer becomes aware of a potential situation involving fraud, corruption, false claims, or other criminal activity related to a USAID project, it should notify the OIG as soon as possible.

## 2. OIG Review & Consultation

OIG will review the initial allegation and contact the implementing partner to further discuss the matter. If the allegation involves ongoing criminal conduct, the implementer should refrain from any activity that may interfere with any future or ongoing investigation.

## 3. Investigation by the OIG

In some cases, OIG will initiate an investigation and will advise the implementer of what actions should be taken.

## 4. Investigation by Implementer

In other cases, OIG and the implementer may mutually agree that the implementer will conduct its own investigation. At the conclusion of the investigation, the implementer should provide a report of the investigation, a statement explaining any financial loss, and copies of any original documentation reviewed during the investigation.

## 5. Disclosure of Information to USAID Compliance Division

Once the investigation is completed, a copy of the above-listed documents will also be sent to the USAID Compliance Division at [compliance@usaid.gov](mailto:compliance@usaid.gov) as well as to the servicing contracting or agreement officer.



# USAID REPORTING REQUIREMENTS

## MANDATORY DISCLOSURES (AWARDS AND SUBAWARDS)

**2 CFR 200.113:** The non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award.

**ADS 303 STANDARD CLAUSE M28:** Consistent with 2 CFR §200.113, applicants and recipients must disclose, in a timely manner, in writing to the USAID Office of the Inspector General, with a copy to the cognizant Agreement Officer, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Subrecipients must do the same and additionally disclose this information to the prime recipient. Recipients must include this mandatory disclosure requirement in all subawards and contracts.

## MANDATORY DISCLOSURES (CONTRACTS AND SUBCONTRACTS)

**FAR 52.203-13:** The Contractor's internal control system requires timely disclosure, in writing, to the agency OIG and the Contracting Officer, whenever, in connection with any Government contract or a subcontract thereunder, the Contractor has credible evidence of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations.

## COMBATING TRAFFICKING IN PERSONS (CONTRACTS AND SUBCONTRACTS)

**FAR 52.222-50:** The Contractor must immediately report to the Contracting Officer information obtained that alleges that any employee, subcontractor, or subcontractor employee has engaged in severe forms of trafficking in persons, procured commercial sex acts, or used forced labor in the performance of the contract.

# USAID REPORTING REQUIREMENTS

## COMBATING TRAFFICKING IN PERSONS (AWARDS AND SUBAWARDS)

**ADS 303 STANDARD CLAUSE M20<sup>1</sup>:** If the Recipient receives any credible information regarding a violation listed in section a(1)-(4) of this provision, the Recipient must immediately notify the cognizant Agreement Officer and the USAID Office of the Inspector General; and must fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.

## CHILD SAFEGUARDING (CONTRACTS AND SUBCONTRACTS/AWARDS AND SUBAWARDS)

**ADS 303 STANDARD CLAUSE M27 & M25:** The Contractor must have a procedure for ensuring that personnel and others recognize child abuse, exploitation, or neglect; mandating that personnel and other report allegations; investigating and managing allegations; and taking appropriate action in response to such allegations, including, but not limited to, dismissal of personnel.

## USAID STAFF & IMPLEMENTING PARTNER REPORTING OF SEXUAL EXPLOITATION AND ABUSE

*NOTE: When reporting an allegation of sexual exploitation or abuse, or any other form of misconduct, the person reporting does not have to specify the category into which the conduct falls. When in doubt, report!*

Sexual exploitation and abuse occurs when people in power exploit or abuse vulnerable populations for sexual purposes. If an aid worker uses their position of authority to solicit sexual favors in exchange for benefits, this constitutes sexual exploitation. If an aid worker uses force or coercion to engage in sexual acts with a beneficiary, including kissing or groping, this would constitute sexual abuse.

IF YOU WITNESS, EXPERIENCE OR LEARN OF SEXUAL EXPLOITATION AND ABUSE IN THE WORKPLACE OR THE FIELD INVOLVING STAFF OR BENEFICIARIES

Report immediately to both

USAID OFFICE OF INSPECTOR GENERAL (OIG)  
Online: <https://oig.usaid.gov/content/oig-hotline>  
Email: [ig.hotline@usaid.gov](mailto:ig.hotline@usaid.gov)  
Telephone: 1-800-230-6539 or 202-712-1023

USAID CONTRACTING OFFICER  
OR AGREEMENT OFFICER

# ADDITIONAL HOTLINES

## **Australia Department of Foreign Affairs and Trade**

<http://dfat.gov.au/about-us/publications/Pages/fraud-anti-corruption-guidance-dfat-partners.aspx>

## **European Civil Protection and Humanitarian Aid Operations (ECHO)**

[https://ec.europa.eu/anti-fraud/olaf-and-you/report-fraud\\_en](https://ec.europa.eu/anti-fraud/olaf-and-you/report-fraud_en)

## **Finland Ministry of Foreign Affairs**

<http://formin.finland.fi/Public/default.aspx?nodeid=49615>

## **German Aid (GIZ)**

[https://www.giz.de/en/aboutgiz/integrity\\_advisor.html](https://www.giz.de/en/aboutgiz/integrity_advisor.html)

## **The Global Fund to Fight AIDS, Tuberculosis, and Malaria**

<https://www.theglobalfund.org/en/oig/report-fraud-and-abuse/>

## **Norwegian Agency for Development Coordination (NORAD)**

<https://www.norad.no/en/front/about-norad/whistleblowing/>

## **Swedish International Development Cooperation Agency (SIDA)**

<http://www.sida.se/English/contact-us/Whistleblower/>

## **UK Department for International Development (DFID)**

<https://www.gov.uk/government/organisations/departments-for-international-development/about#reporting-fraud>

# ADDITIONAL HOTLINES

## **International Organization for Migration (IOM)**

<http://www.iom.int/office-director-general>

## **United Nations Development Programme (UNDP)**

[http://www.undp.org/content/undp/en/home/operations/accountability/audit/office\\_of\\_audit\\_andinvestigation.html#report](http://www.undp.org/content/undp/en/home/operations/accountability/audit/office_of_audit_andinvestigation.html#report)

## **United Nations Educational, Scientific and Cultural Organization (UNESCO)**

<http://www.unesco.org/new/en/unesco/about-us/how-we-work/accountability/internal-oversight-service/investigation/how-to-report-fraud-corruption-or-abuse/>

## **United Nations Population Fund (UNFPA)**

<http://web2.unfpa.org/help/hotline.cfm>

## **United Nations High Commissioner for Refugees (UNHCR)**

<http://www.unhcr.org/en-us/making-complaint.html>

## **United Nations Children's Fund (UNICEF)**

[https://www.unicef.org/auditandinvestigation/index\\_65761.html#Report\\_Fraud\\_or\\_Abuse](https://www.unicef.org/auditandinvestigation/index_65761.html#Report_Fraud_or_Abuse)

## **United Nations Office for Project Services (UNOPS)**

<https://www.unops.org/english/About/accountability/IAIG/Pages/How-to-report-wrongdoing.aspx>

## **World Food Programme (WFP)**

<https://www.wfp.org/contact>

U.S.AGENCY FOR INTERNATIONAL  
DEVELOPMENT (USAID)  
OFFICE OF INSPECTOR GENERAL (OIG)  
OFFICE OF INVESTIGATIONS

**FRAUD PREVENTION AND  
IMPLEMENTING PARTNERS**  
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MIDDLE EAST CRISIS HUMANITARIAN RESPONSE

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