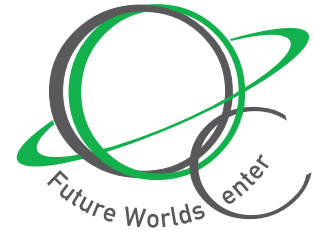




Strengthening **Asylum**



FUTURE WORLDS CENTER'S ANTI-FRAUD AND WHISTLE-BLOWING POLICY

1. Introduction

Future Worlds Center (leg. Registered as Cyprus Neuroscience and Technology Institute; E072) is a non-governmental organization founded in 1991. Independent, private and not-for-profit, Future Worlds Center respects a strict political and religious impartiality and operates according to non-discrimination and transparency principles. It promotes and enforces full transparency.

All its constitutional and operational policies, projects, activities, reports, contracts, and people are online in an open source MediaWiki platform with all its associates and members having access to edit any page, thus guaranteeing maximum openness, accuracy and transparency.

For the above reasons, FWC is registered in the Transparency Register of the European Commission, where all information regarding its activities and financial information can be found (under its legal name) following this link:

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=250272920238-79>

All correspondence, including Email should include the following sentence at the footer:

**CNTI is registered in the EU Transparency Register
ID number: 250272920238-79**

Future Worlds Center aims at promoting the culture of coexistence, human rights, sustainable development and peace, using methods that are based on the latest technologies, the science of dialogic design and democratic dialogue. FWC mission is to enable and encourage people to rethink, reflect and resolve social challenges, at a local, European and global level.

1. Efficiency-driven: We are knowledge-based, people-oriented, and action-oriented
2. Guided by Solidarity and Responsibility: Our actions are impartial, and form the basis for our advocacy
3. Integrity based: We are accountable to all our stakeholders, transparent in our actions and conduct
4. Impact focused: We are relevant to the needs of the context, proposing innovative solutions.

Future Worlds Center is committed to the highest standards of efficiency, accountability and transparency in its activities and to an effective Anti-Fraud and Corruption Policy that:

- Encourages prevention
- Promotes detection and
- Identifies a clear pathway for investigation

http://www.futureworlds.eu/wiki/Policy:_Anti-Fraud_and_Whistle-blowing

All associates, interns, and volunteers must acquaint themselves and bind with all policies by signing a number of documents such as:

- Honor Declaration
- Code of Conduct
- Confidentiality and Non Disclosure Agreement
- Receipt (return) of keys
- Gentlemen's Agreement
- Consent of User(s) of the subscriber's telephone lines to the provision of itemized bills

The anti-fraud and whistle-blowing policy intends to provide guidance to Future Worlds Center's employees and partners and should be read in conjunction with Future Worlds Center's Code of Conduct, Future Worlds Center's Finance, Logistics, Human Resources, Internal Audit and Securities policies and procedures in relation to prevention, detection and reporting of fraud.

The anti-fraud and whistle-blowing policy is designed to:

- Promote standards of honest and fair conduct
- Encourage prevention of fraud and corruption
- Maintain strong systems of internal control
- Promote detection
- Pursue a zero tolerance policy and bring to justice anyone who commits acts of fraud or corruption
- Recover any losses incurred

2. Definitions

Future Worlds Center defines corruption as «a dishonest conduct that consists of seeking, soliciting, accepting or receiving – directly or indirectly – all unjustified payment, gift or benefit for having undertaken, or, alternatively, for having abstained from their professional obligations».

Corruption can take many forms (but is not limited to), such as:

«Bribes»	Payments to officials so that they act faster, with more flexibility and more favorably. Bribes paid to NGO staff by suppliers or beneficiaries;
«Fraud»	Falsification of data and of bills, collusion, etc.
«Extortion»	Money obtained through coercion or force.
«Favoritism»	The fact of favoring relatives.
«Nepotism»	
«Misappropriation of funds»	Supplies sold for personal gain, theft of resources by employees, resources given to ghost staff or beneficiaries, who do not really exist, etc.

The term *fraud* is used more generally to describe acts of deception, extortion, bribery, forgery, concealment of material facts and collusion. Fraud is most often associated with a deliberate intent to acquire money or goods dishonestly through the falsification of records or documents and/or the deliberate changing of financial statements or other records. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.

Computer Fraud: is where information technology equipment has been used to manipulate programs or data dishonestly or where the information system is a material factor in the perpetration of the fraud. Theft of fraudulent use of computer time and resources is included in this definition.

Theft: Dishonestly acquiring, using or disposing of physical or intellectual property belonging to FWC or to individual members of the organization.

Misuse of equipment: Deliberately misusing materials or equipment belonging to FWC.

Abuse of position: Exploiting a position of trust within the organization. For instance, Favoritism» («Nepotism», «Collusion») as to favor relatives or friends.

3. Future Worlds Center's policy

Future Worlds Center is committed to fight against all forms of corruption and formally prohibits facilitation payments except if a special derogation is granted by the Board in the event of an emergency, risk of death or injury of a Future Worlds Center's staff or beneficiary.

FWC will continually strive to ensure that all its financial, contractual and administrative processes are conducted and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free from personal interest. FWC will not condone any behavior that falls short of these principles. FWC Directors, staff and volunteers have a responsibility for putting these principles into practice and for reporting any breaches they may discover.

4. Future Worlds Center's anti-corruption principles

Future Worlds Center defines in the introduction to its Human Resources Manual 8 key principles (among which 3 principles highlighted in italics are directly linked to the anti-corruption policy): independence, impartiality, non-discrimination, free and direct access to victims, ethics, *professionalism*, *anti-Corruption and transparency and accountability*.

Anti-Corruption: Future Worlds Center refuses to directly or indirectly support fraudulent actions and undertakes to minimize risks of corruption in the implementation of its activities.

Transparency and Accountability: Future Worlds Center commits to be fully accountable and transparent towards its beneficiaries, partners and financial donors, by providing access to information regarding the allocation and management of its funds. The organisation undertakes to have in hand all necessary tools to ensure the correct management of its operations.

Professionalism: Future Worlds Center bases its conceptualisation, implementation, management and evaluation of programmes on high standards of professionalism, and capitalises on its experience in order to maximize efficiency and resources.

Each Future Worlds Center employee certifies adhering to these principles by undertaking the **Human Resources Manual Acceptance Form**.

All breach of these principles, including conflict of interest or any corruption activity, may give **grounds for contract termination**. In such a situation arises the individual will be held personally responsible and Future Worlds Center will seek legal action if applicable.

5. Procedures implemented by Future Worlds Center to prevent corruption

Future Worlds Center has developed a series of preventive mechanisms and internal control systems aiming to prevent fraud and corruption (Finance, Logistics, HR and Internal Audit Manuals);

Fraud can be avoided most effectively by creating an effective organizational culture that uses money carefully. This is a difficult task, which goes to the root of financial management and how an organization works to achieve its mission.

Some principles may help in preventing fraud such as:

- Providing staff with a clear sense of purpose and direction and inspiring them to live out Future Worlds Center's values.
- Putting in place appropriate controls and checking that such controls are working - in a way that empowers staff to make good judgements. This also means providing staff with the training and support they need to work in practice.
- Making sure that members of staff maintain a respectful dialogue with beneficiaries. Financial reporting to beneficiaries is a particularly effective way of reducing the chance of fraud.

6. Procedures and Responsibilities for cases of fraud suspicion or misbehavior

Whistle blowing policy

Future Worlds Center has adopted a participative approach in order to enhance the strict implementation of its humanitarian mandate as a non-political and non-religious aid organization, with eagerness to provide equal opportunities and to guarantee gender equality, security, welfare and transparency.

As a consequence, any allegation of fraud, waste or abuse that may involve operations conducted by Future Worlds Center, its premises or personnel is accepted and taken very seriously by Future Worlds Center.

Any member of staff, contractor, partner or beneficiary considering that unethical behaviour has occurred is encouraged to report personally these infractions supported by any evidence and facts they can provide.

Overall responsibility for managing the risk of fraud is with the Board. Their Responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organizational Objectives
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk
- Identified
- The design of an effective control environment to prevent fraud
- Establishing appropriate mechanisms for, (a). Reporting fraud risk issues and (b). Reporting significant incidents of fraud or attempted fraud to the Board of Directors
- Liaising with the Organization's appointed Auditors
- Liaising with the Finance team
- Ensuring that all staff are aware of the Organization's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud

- Ensuring that appropriate anti-fraud training is made available to Directors, staff and volunteers as required
- Ensuring that appropriate action is taken to minimize the risk of previous frauds occurring in future.

Persons currently responsible for receiving such complaints are Corina Drousiotou and Manos Mathioudakis. Personnel are also informed if needed they can bypass the above and make a complaint to the Board.

7. Internal Investigation

Internal audit department

The Financial Unit is responsible for ensuring the quality of internal quality control mechanisms, to perform internal audits and to follow-up external audits. It also carries out an independent oversight of Future Worlds Center's anticorruption policy and their enforcement with regards to all Future Worlds Center's operations and promotes overall transparency within the organization. In particular, the Audit, Legal and Transparency department is in charge of addressing all corruption issues in all Future Worlds Center's entities and representations.

Specific fraud and Financial Irregularity audits

Fraud and financial irregularity audits are designed to verify the existence and magnitude of suspected fraud and financial irregularities. Fraud and financial irregularity audits may be conducted at the request of the Board of Directors, the Chair of the Board or any other senior members of Future Worlds Center's management; as a result of a tip from the Future Worlds Center's Financial Unit. The Internal Auditor shall utilize the highest level of discretion when undertaking a fraud or financial irregularity audit. The Internal Auditor shall promptly notify the Board of Directors, the General Director and other senior members of Future Worlds Center's management, as appropriate, of any significant findings which result from a fraud or financial irregularity audit.

8. What to do in case of a facilitation payment request?

- Explain that this type of practice is against Future Worlds Center's policy;
- Refuse to pay;
- Note the name of the requester and request its employment card;
- Report the fraud / corruption attempt to coordination.
- As for all fraud and or corruption cases inform the CEO and Board of Directors, as per the procedures explained above, who will decide on the necessary actions.

9. Actions Arising from Fraud Investigations

Disciplinary procedures Persons who are judged guilty of fraud have committed gross misconduct and will be dealt with in accordance with the HR Policy on Disciplinary Action. Proven allegations of fraud may result in dismissal.

In addition, where appropriate, Future Worlds Center will refer significant fraud to the local law enforcement agencies with a view to initiating criminal prosecution. Consideration should be given to the local context and the consequences in terms of human rights of initiating criminal prosecution against the individuals involved. In every case, the final decision whether or not to prosecute should be taken by the Audit Director, the Regional Director and the General Director.

Lessons learned and improvement of internal controls The fraud investigation is likely to highlight where there has been a failure of supervision and /or a breakdown or absence of control; the course of action required to improve systems should be documented in the investigation report and implemented when this report is finalised.

Recovery of losses

Where Future Worlds Center has suffered loss, full restitution will be sought of any benefit or advantage obtained and the recovery of costs will be sought from individual(s) or organizations responsible for the loss. If the individual or organisation cannot or will not make good the loss, consideration will be given to taking civil legal action to recover losses

No action will be taken against anyone who has reported a potential fraud should the suspicion turn out to be unfounded, provided that they have acted in good faith. Malicious accusations may be the subject of disciplinary action.

10. Application to Partner Organizations and Consultants

Contracts with partner organisations and with consultants should make explicit reference to the existence of this policy and should require partner agencies and consultants to report any frauds that arise in their dealings with the organisation or that in any way involve the resources of the organisation. In addition all contracts with partners and consultants should either include a copy of this policy as an attachment or clearly specify where a copy can be obtained.

(This Policy is included in the Policies and Procedures of FWC that can be accessed here (link))

11. Effective Date

The Anti-Fraud Policy will come into effect immediately as of 1/5/2016

12. Review of this Policy

This document will be reviewed periodically by the Board in order to determine whether it remains useful, relevant and effective.