TRACE

**Guidelines on the Funding Context and on Fraud, Anti-corruption and Whistleblowing**

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Over the past few months the TRACE programme, supported by DFID, DANIDA and DFAT, has provided information to prospective civil society partners and others on the broad goals and objectives of the programme and has received 230 concept notes which are currently under consideration.

TRACE is mindful that expectations are very high with regards to the quantum of funds available and the amount of funding any one organisation might receive.

We feel it is important to remind prospective partners that the funding pool in Zimbabwe has shrunk dramatically in recent years – and indeed in recent months. Recent announcements of the pending departure from Zimbabwe of Denmark and Norway, on top of reduced funding from Australia and Canada, underline the gravity of this situation.

The decrease in overall funding availability means that expectations need to be re-assessed. It may even mean a possible scaling down of some activities.

TRACE will continue to work with CSOs to respond to well formulated and innovative proposals and we look forward to a fruitful partnership.

**Anti-Corruption Measures**

TRACE has a zero tolerance approach to corruption and fraud.

Fraud takes many forms. It may involve, for example, the provision of budgets embedding inflated costs or the provision of false receipts and invoicing through to the offering or acceptance of kickbacks for cash or favours in kind for preferential treatment.

Opportunity for fraud is mitigated by a number of strategies.

* First, no one single individual has responsibility for approving concept notes or proposals. These decisions are taken collectively by the Steering Committee.
* Second, TRACE also has a strong emphasis on due diligence which involves a thorough pre-contracting assessment of an organisation’s internal financial management and governance structures and of an entity’s ability and record in managing funds. This process also involves the conduct of spot checks as well as regular and sometimes unannounced audits as well as cross-checking organisational history with other donors and funding bodies.
* Third, all groups funded by TRACE will undergo mandatory training in fraud, anti-corruption and whistle-blowing policy and practice.

These three standards on fraud and due diligence reflect best practice in global project management.

**Reporting Fraud and Corruption**

As part of its zero-tolerance policy TRACE is committed to providing a safe environment within which concerns about fraud and corruption may be reported.

In Zimbabwe if you, as an individual within a CSO or grantee body has a concern about possible fraud you can report it directly to TRACE through [TRACEinfo@dai.com](mailto:TRACEinfo@dai.com) or by calling:

* **Margie Cook (Team Leader)** on +263 (0) 782 721 84, or
* **Abel Chikomo (Deputy Team Leader)** on +263 (0) 772 260 664

*Alternatively you can make reverse charge calls to the hotline number below:*

1. From an outside line contact your local operator
2. Request a reverse charge or collect call to be placed to the United States, to the number below
3. When the operator asks who is placing the call, give your company name. Do not give your name
4. All reverse charge or collect calls will be accepted by the **EthicsPoint Contact Center**

**1 503-597-4328**

*These calls can be made from Skype*

If you are concerned about anonymity, you can also report issues of fraud and corruption to **DAI’s Chief Ethics and Compliance officer** in the US on **1-301-771 7978**.

Every report will be investigated.

TRACE takes reports of fraud and corruption very seriously and is also committed to supporting informants or whistle-blowers against any retaliatory action.

We aim to keep TRACE corruption-free. We can do this only with your help.