



Lizu Community Network

ANTI-FRAUD, ANTI-CORRUPTION AND WHISTLEBLOWING POLICY (2025 Edition)

1. Purpose and Scope

This policy sets out Lizu's commitment to preventing, detecting, and responding to fraud, corruption, and unethical practices in all operations. It applies to staff, board members, volunteers, contractors, and partners, and ensures compliance with:

- **The Anti-Corruption Act No. 3 of 2012**
- **The Public Finance Management Act No. 1 of 2018**
- **The Penal Code (Chapter 87)**
- **Donor regulations**

2. Objectives

- Establish a zero-tolerance stance on fraud and corruption.
- Promote integrity and transparency in financial and operational management.
- Provide secure and confidential reporting channels for whistleblowers.
- Comply with national and donor standards for accountability.

3. Definitions

Fraud: Deception intended to secure unfair or unlawful gain.

Corruption: Abuse of entrusted power for private benefit.

Whistleblower: A person who reports misconduct in good faith.

4. Guiding Principles

Integrity: Uphold honesty in all actions.

Transparency: Maintain openness in decision-making.

Accountability: Everyone is responsible for safeguarding resources.

Protection: Whistleblowers are protected from retaliation.

5. Legal and Donor Compliance

Lizu aligns with:

Anti-Corruption Commission (ACC) Guidelines (2023)

Zambia's Whistleblower Protection Act No. 4 of 2010

USAID Mandatory Standard Provisions

EU Financial Regulation (2018)

ActionAid Accountability Charter

6. Institutional Responsibilities

Role	Responsibility
Board of Directors	Oversight, review of reports, and sanctioning authority.
Executive Director	Implement anti-fraud controls and ensure awareness.
Finance Officer	Maintain internal controls, verify transactions, and detect anomalies.
All Staff and Partners	Report suspected fraud, avoid conflicts of interest, comply with procedures.

7. Prevention Measures

- Conduct **due diligence** on suppliers, consultants, and partners.
- Enforce **segregation of duties** and dual authorization for transactions.
- Maintain a **risk register** identifying potential corruption risks.
- Include **anti-corruption clauses** in all contracts.

8. Reporting and Whistleblowing Channels

Reports can be made through:

- Direct report to the **Executive Director** or **Board Chairperson**
- **Anonymous email or phone line** ([confidential@lizu.org])
- **Suggestion box** at office premises

All reports are acknowledged within 48 hours and investigated confidentially.

9. Investigation and Disciplinary Procedures

- An **Investigation Committee** is appointed by the Board.
- Findings documented and reviewed within 30 days.
- Outcomes may include warnings, dismissal, contract termination, or legal referral.

10. Protection of Whistleblowers

- No whistleblower will be victimized, demoted, or dismissed for reporting in good faith.
- False or malicious allegations may result in disciplinary action.

11. Documentation and Evidence Handling

All evidence must be secured, dated, and handled confidentially.
Reports are filed by the Finance Officer and retained for seven years.

12. Training and Awareness

All staff and partners receive annual training on anti-fraud procedures.
Special sessions held for management and finance personnel.

13. Sanctions and Enforcement

Violations will result in disciplinary action including:

- Dismissal or contract termination
- Recovery of misused funds
- Referral to the **Anti-Corruption Commission (ACC)** or law enforcement

Report any case through: fraud@lizu.org