



**Terms of Reference for the recruitment of a
storage system and storage and distribution
capabilities consulting Firm**

Funding: RSS/TB Grant Global Fund



NOTICE FOR THE RECRUITMENT OF A CONSULTING FIRM FOR THE EVALUATION AND STUDY FOR STORAGE SYSTEMS AND STORAGE AND DISTRIBUTION CAPACITIES FOR PHARMACEUTICALS PRODUCTS IN NIGER.

Save The Children International (SCI) is the world's first independent children's organization. Its vision is a world in which every child has the right to survive, the right to protection, development and participation. Its mission is to achieve critical progress in the way the world treats children and make immediate and lasting changes in their lives. SCI works in Niger with State departments, NGOs and national institutions, local structures and the communities in the 8 regions.

SCI Niger has been selected as the main recipient of the Global Fund to Fight AIDS, Tuberculosis and Malaria in the framework for the project to improve the fight against tuberculosis and strengthen the Niger Health system (TB & RSS For Niger) for the period January 2016 to December 2018.

As part of this project, SCI Niger is seeking to recruit, on behalf of the ONPPC, **A specialized consulting firm in storage systems and storage and distribution capacities with more than 15 years of experience in evaluating and strengthening the storage and distribution system of purchasing centers throughout Africa and the world.**

The Consulting firm will be chosen by the least cost method in accordance with the procedures described in the terms of reference.

Any candidate interested in this notice may obtain the terms of reference free of charge from the SCI Niger secretariat located in Niamey, Plateau District, Rue des Lacs PL54 from Thursday, April 12, **2018** or by mail sent to Niger.Appeloffres@savethechildren.org from Monday to Friday during working days **(8:00am to 5:00pm (UTC+1))** or by mail sent to Niger.Appeloffres@savethechildren.org with the following subject " ONPPC Capacity Assessment ".

Bids must be submitted under sealed envelopes at the National office of Save the Children International Niger in Niamey, Plateau District, Rue des Lacs PL54 no later than May 3th, 2018 at 12:00 **(UTC+1)**, or at the following email address:

NigerGFprocurement.bid@savethechildren.org.

Additional information may be obtained on business days from **8:00 am to 5:00 pm** at the following email address: Niger.Appeloffres@savethechildren.org.


Paul W. M. Armour, Country Director



Background and Rationale:

Save The Children International (SCI) is the world's first independent children's organization. Its vision is a world in which every child has the right to survive, the right to protection, development and participation. Its mission is to achieve critical progress in the way the world treats children and make immediate and lasting changes in their lives. SCI works in more than 120 countries around the world and has extensive experience in the field of emergencies and development. Its programs focus on health, Nutrition, food security and livelihoods, child protection and education. For the development of its services for children, SCI works with state departments, NGOs and national institutions, local structures and communities in the regions of Maradi, Zinder, Diffa and Niamey.

Thanks to its extensive experience, SCI Niger has been selected as the main recipient of the Global Fund to Fight AIDS, Tuberculosis and Malaria under the Tuberculosis project and strengthening the Niger Health system (NFM TB and RSS project For Niger) for the period January 2016 to December 2018.

As part of the strengthening of the health system, the grant provides for the rehabilitation and construction of several health facilities. This will focus, among other things, on: the rehabilitation of the 5 existing ONPPC shops. Incidentally, ONPPC has led a selection process for Companies responsible for the rehabilitation of stores, which according to the Global Fund, do not meet international standards and do not consider “Niger’s supply chain strategy”. In addition, the proposal does not guarantee the reliability, efficiency, increased space and storage conditions and safety with respect to the supply chain for all products purchased with grants in accordance with the relevant provisions for Management of purchases and stocks approved by the Global Fund.

Thus, these Terms of reference are part of the vision of alleviating the inadequacies and shortcomings mentioned above.

Overall objective:

Strategically improving the storage capacity of Niger, starting with the ONPPC

Specific objectives:

1. Assess current conditions, capabilities and needs in relation to storage strategies validated by the country DPH/MT and ONPPC)¹
2. In view of the SWEDD recommendation validated regarding the distribution circuit, make a proposal for a sustainable storage strategy for Niger²
3. Evaluate the current ONPPC design, its branches including popular pharmacy (PP), a sample of District Pharmacy and health centers (the 20/80) according to International standards, good storage practices and increased storage space requirements
4. Propose the new ONPPC design for warehouses at both the central and the decentralized levels 3 considering the approach validated by the ONPPC and the DPH/MT,
5. Evaluate the ONPPC warehouse management information System and make strategic proposals with the objective of improving the performance of the ONPPC,
6. Evaluate current warehouse management procedures by ONPPC, its branches and districts,
7. Assess fire risks and identify strategies for mitigation of these risks,
8. Evaluate the human resources used for the management of ONPPC's warehouses,
9. Make strategic proposals to equip the ONPPC with the necessary human resources to achieve an acceptable level of performance,
10. Analyze the current inputs distribution strategy and identify appropriate actions to improve the input distribution system performance and the equipment required for this purpose,
11. Based on current applications in medicine, requests from past years and the expected rate of population growth in Niger, identify the ideal location for the ONPPC Warehouse and its hubs to bring them closer to the Patients,
12. Identify equipment requirements (including technical specifications and estimated budget) necessary for the proper operation of ONPPC (central and regional) warehouses

¹ The SWEDD project following the evaluation of the health products supply chain has proposed three approaches for the distribution of health products. One of these approaches has been validated by the DPH and the ONPPC. That approach is being referred to here.

² This strategy will have to cover the country's needs for the next 10 or even 15 years on one hand while allowing the strategic inputs of the patients to be reconciled,

³ It is recommended that these designs be budgeted taking into account the costs associated with the construction, but also the potential costs of operation of the new central warehouse and these branches.

13. Propose a budgeted storage approach taking into account existing and validated studies at the country level
14. Prepare technical specifications for the selection of a responsible entity for the construction and/or rehabilitation of the warehouses
15. Propose a mechanism to keep track of the work and the validation of the delivery.
16. Ensure that recommendations are taken into account with the ONPPC's institutional audit report by ACAME

Deliverables/Expected results:

1. Assessment Report for the capacity and conditions of ONPPC storage
2. Design of the new ONPPC and its branches,
3. Assessment Report for the ONPPC Warehouse management procedures,
4. Proposals for the options for the perennial improvement of the storage space to be validated by ONPPC and DPH regarding allocating a share of the budgets for the construction and another part for the operation,
5. Propose a ONPPC warehouse management Information system, its cost and implementation plan,
6. Propose a draft manual of procedures for the management of ONPPC warehouses at the central and regional level (at least),
7. Identify the ideal location of ONPPC branches and Its hubs in order to bring the stocks closer to the patients and reduce the operating costs of the ONPPC,
8. Provide the Human Resources diagnostic report allocated to warehouse management,
9. The technical specifications and the budget necessary for the purchase of the equipment necessary to the storage system are defined,
10. The new distribution strategy is identified and budgeted, the technical specifications of the equipment to be filled for this reinforcement are identified,
11. Fairly complete and exhaustive budget estimate with regard to the need and gap identified in the evaluation on the storage capacity of the ONPPC
12. Proposal for technical specifications for the selection of an entity responsible for the rehabilitation/construction
13. Identify the fire risks for the ONPPC and its branches,
14. Proposal for a follow-up plan for the rehabilitation works.

Duration of the evaluation and Studies:

The maximum duration of this evaluation/study and proposals of the above listed actions may not exceed 60 days calendars from the date of contract signature with the consulting firm.

Qualifications required for the evaluation and studies:

- The firm must have some expertise and experience in evaluating the capacity of the storage conditions of pharmaceuticals, specialize in storage systems, storage and distribution capacities having at least 10 years' experience in evaluating and strengthening the storage and distribution system of purchasing centers throughout Africa and the world.
- Have very good knowledge of safety/fire measures in such environment and be immediately available.
- Have a good knowledge of warehouse management systems in general and those used In Africa,
- Have done this type of work in at least five countries around the world including three in Africa.

In order to guarantee the mission's objective, the consulting firm will need to provide, at its own expenses, a specialized support staff with satisfactory experiences in the other areas of services where it does not have sufficient expertise, such as electricity and Fire safety, cold and air conditioning, Architecture...

Due to the specificity of the work to be done, and the nature of the invitation to tender (AOI) the linguistic factor cannot constitute a barrier. However, in this case, it will be up to the selected consulting firm to make all the arrangements for translating the report into two languages (French and English). It is understood here that the work to be done will take into account the good storage practices, the ABC analysis, the zoning, the storage units, the security of the stocks and the personnel working in those warehouses.

SELECTION CRITERIA

Essential criteria:

All applicants must meet the following criteria:

1. Agree to comply with SCI's (SCI Niger Code of Good conduct, anti-fraud policy, child protection and safeguards policy) policies.
2. Agree to abide by the laws and Regulations of the Republic of Niger (see Technical submission letter)
3. Head of Mission: have at least a university degree+ 5 years in any relevant field (Architecture, Civil Engineering, logistics or any other degree in connection with the expected delivery) and a minimum of 10 years of experience in evaluating and strengthening the system of storage, capacity and distribution of purchasing power plants.
4. Be immediately available to start the delivery (See Technical submission letter)

Preferential criteria:

Applicant's tenders will be evaluated based on the criteria and sub-criteria below:

Criteria and sub-criteria	Scoring breakdown	Scale
I.1. Personnel		60 points
<i>Head of Mission: Storage System specialist, storage and distribution capabilities</i>	<p><u>Notation</u></p> <ul style="list-style-type: none"> • <i>Specialization in storage System, Storage capacity and distribution (to be justified by a certificate, attestation or equivalent document): 10 points</i> • <i>Knowledge of fire safety measures (to be justified by a certificate, an attestation or any equivalent document): 10 points</i> • <i>Knowledge of warehouse management systems in Africa (to substantiate with a certificate, attestation or equivalent document): 5 points</i> 	25 points
<i>Other skills or support staff.</i>	<p>In the description of its methodology and plan of work, the Consulting firm must provide the following skills, on the understanding that only one technician can provide several services according to his or her justified knowledge.</p> <p><u>Conditions for consideration:</u> Certified copy of Diploma (or any other relevant document), signed and legalized letter of undertaking (if different from the head of mission).</p> <p><u>Notation</u> Architecture (15 points) :</p> <ul style="list-style-type: none"> • <i>General experience in architecture (at least 8 years): 5 points otherwise 0 point</i> • <i>Similar experiences (design of storage infrastructures for pharmaceuticals): 10 points</i> <ul style="list-style-type: none"> ○ <i>3 points for a project</i> 	35 points

	<ul style="list-style-type: none"> ○ 5 points for 2 projects; ○ Ten points for more than two projects. <p>Civil Engineering (10 points):</p> <ul style="list-style-type: none"> • General experience (at least 5 years): 5 points otherwise 0 point • Similar experiences (technical studies of storage or warehouse infrastructures): 5 points <ul style="list-style-type: none"> ○ 1.5 Point For a project ○ 3 points for 2 projects; ○ 5 points for more than two projects <p>Cold Electricity and air conditioning (10 points)</p> <ul style="list-style-type: none"> • General experience (at least 5 years): 5 points otherwise 0 point • Similar experiences (studies of electrical circuits for the storage of pharmaceutical products): 5 points <ul style="list-style-type: none"> ○ 1.5 Point For an experiment; ○ 3 points for two experiments; ○ 5 points for more than two experiments 	
I.2. Organization of the Mission		10 points
Organization	<ul style="list-style-type: none"> • Organization of the Mission in terms of human resources and roles and interactions (who does what at what stage) (5 points) ; • The work schedule respecting the maximum period of 60 calendar days and highlighting the various stages (meetings field visit, analysis of the data...) their durations and forecast periods of execution (5 points). 	10 points
I.3. Similar justified experiences (studies of storage System, storage capacity and of distribution for the purchasing centers around the world and Africa in connection with the storage infrastructures of pharmaceutical products)		30 points
	<ul style="list-style-type: none"> • Experiences around the world including Africa (15 points) <ul style="list-style-type: none"> ○ Experience in one (1) Country: 3 points ○ Experience in two (2) Countries: 6 points ○ Experience in three (3) countries: 9 points ○ Experience in four (4) Countries: 12 points ○ Experience in at least five (5) Countries: 15 points • Specific experiences in Africa (10 points) <ul style="list-style-type: none"> ○ Experience in one (1) African country: 2.5 points ○ Experience in two (2) African countries: 5 points ○ Experience in at least three (3) African countries: 10 points • Experience in Niger (5 points) <ul style="list-style-type: none"> ○ Experience In Niger: 5 points 	30 points

	Note : The same experience will be counted in each of the sections to which it belongs. For example, an experiment In Niger will be counted in all three sections.	
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Application file

Interested candidates must submit their applications in an offer Administrative, offers Technical and financial offer. The contents of the offers must be:

Administrative offer:

1. The technical submission letter specifying the availability and commitment to abide by the laws and regulations of the Republic of Niger (see Model in annexes)
2. SCI's Code of Good Conduct and other policies initialed and signed;
3. A Certificate of approval issued by a Competent authority;
4. A tax regularity certificate (ARF) of less than three (3) months on the closing date for national candidates or, as appropriate, a certificate of non-double taxation or a statement of commitment to be paid by withholding tax on Benefits of non-residents, issue by Nigerian tax services for foreign candidates;
5. A certificate of non-bankruptcy and non-judicial liquidation valid on the date of closing of offers for nationals or any other equivalent document for foreign candidates;
6. The diplomas, certificates, attestations and CVs of the head of mission justifying the minimum 10 years of experience in evaluating and strengthening the storage system, capacity and distribution of purchasing centers.

All these documents are obligatory and the absence of at least one of these documents will be a rejection of the offer.

Technical offers:

1. The description of the methodology and work plan proposed to accomplish the mission;
2. The composition of the support team and the responsibilities of its members, accompanied by their résumés (CV), diplomas, certificates, Attestations... certified and signed Letters of Commitments and legalized (See Appendix Letter of Commitment model);
3. Consulting firm references Accompanied by supporting documents (certificate of good end or equivalent, cover pages and contract signature)

Financial offer:

The financial offer of the firm is deemed to take into account all costs related to the delivery including miscellaneous travel, visa, accommodation... It must be consistent with the technical offer, the steps, staff and tasks charged must be detailed in the description of the methodology.

The financial offers must include the following parts:

1. The letter of submission duly completed and signed;
2. The cost summary statement (see form);
3. Cost details (see forms)

Preparation of Offers

Submission and signature of bids

The Consulting firm will submit each offer in one (1) original and one (1) copy, stating clearly "original" and "copy" as applicable. In case of discrepancy between the original and the copy, the original will be authentic.

The original proposal is initialed and signed by the person (s) duly empowered to affix their Signatures on behalf of the firm.

The proposal will not include any changes or overloads, with the exception of those intended to correct the bidder's errors, in which case these corrections will be initialed by the signatory ((or Parties) of the proposal).

For electronic submissions, only documents submitted in original or legalized version will be accepted

Sealing and marking of proposals

The consulting firms will prepare their offers in a large, closed, anonymous outer envelope addressed to the Bureau of SCI Niger located in Niamey Plateau district, rue des Lacs PL54 and bearing only the following particulars:

- TB & RSS Project For Niger, Evaluation capacities ONPPC;
- Only open in the counting session.

The envelope will contain three (3) others marked «Administrative Offers », "Technical offer" and "offer and the addresses of the Cabinet.

Failure to comply with the presentation described above could result in a nullity of the offer.

The consulting firms ensure that the order and numbering of the parts are respected in their offers. If the order and numbering are not respected, SCI Niger will not be held responsible for the failure to take into account a part in the analysis of the offers.

Under penalty of rejection, the outer envelope must be sealed and not bear any sign to identify the consulting firm.

For electronic submissions, these offers will be presented in 3 (three) separated files: an Administrative Offer, Technical Offer, Financial Offer transmitted in one shipment

Offers Submission

Date and time limit for Submission of Offers

Tenders submitted in accordance with the provisions described above shall be sent to the National office of Save the Children International Niger at the following email address: NigerGFprocurement.bid@savethechildren.org no later than May 3, 2018 at 12:00, Niger time (UTC+1).

Bidders are allowed to use only one submission mode. For electronic submissions, only one offer is required. In case of several offers sending, the last shipment will be only considered

SCI Niger may, in exceptional circumstances and at its discretion, extend the deadline for submission of tenders by publishing a corrigendum under the same conditions as the recruitment notice. The rights and obligations of SCI Niger and the bidders previously governed by the deadline initially adopted will be governed by the new deadline.

Late submission

No offer will be received after the date and time limit for submitting bids.

The electronic offers received after the deadline (May 03, 2018 at 12:00 Niger time), will not be considered

Amendment and withdrawal of offers

The bidder may amend or withdraw his offer after having submitted it, if SCI Niger receives written notification of the amendment or withdrawal before the deadline for submission of offers.

Notification of amendment or withdrawal of the offer by the bidder shall be drafted, sealed and marked. The withdrawal may also be notified by any means of communication possible, but in this case must be confirmed by a duly signed written notification, and whose date, the postmark being authentic, will not be later than the deadline set for the surrender offers.

For electronic submissions, if the offer is modified, the supplier should return the entire offer. In case of exceptional situations notified to Save the Children related for example to the high size of the files, the offers can be subjected to several sending's for example in administrative offer, then technical, finally Financial.

Opening of folds, EVALUATION of offers and assignment

Opening folds

The opening of the offers is planned on May 4th, 2018 at 10:00am, local time in the meeting room of the National Bureau of SCI Niger located in Niamey District Plateau, Rue des Lacs PL54. The opening session will take place in the presence of the candidate's representative who wish to participate into the session.

For offers submitted electronically, only the administrative and technical offers will be requested first to the independent platform managing the e-mail address.

Evaluation of offers and technical score

An evaluation committee, set up by SCI Niger, will evaluate the offers based on their compliance with the terms of reference as follows

- The Committee shall retain the bids, which have met all the essential criteria. At this stage, an offer is rejected if at least one part is absent or non-compliant.
- The Committee then evaluates the technical offers selected using the criteria, sub-criteria and the points system specified above. Each compliant offer is assigned a technical score (ST). An offer is rejected at this stage if it does not reach the minimum technical score of 60 points out of 100.

SCI Niger reserves, at its discretion, the right to review the above clauses in the event of insufficient qualified bids.

Evaluation of financial offers and ranking

The Evaluation committee first checks the completeness and coherence of the financial offers and corrects the errors.

The consulting firms are classified according to their financial offers, and the firm with the lowest conforming financial offer is ranked first.

Negotiations

The contract is negotiated with the firm ranked first. These negotiations include a discussion of the technical offer, the proposed methodology (work plan), staffing and any suggestion made by consulting firm to improve terms of reference. SCI Niger and the consulting firm are then developing the final terms of reference, staffing and planning indicating the activities, the staff used, and the time spent in the field and at Headquarters, working time, logistical aspects and Reporting requirements. The work plan and final terms of reference agreed upon are then incorporated into the "service Description", which is part of the contract. The firm selected will clearly define the inputs that SCI Niger must provide to ensure the proper performance of the mission.

The financial negotiations shall, inter alia, specify (where appropriate) the tenderer's tax obligations and the manner in which they are taken into account in the contract; they also incorporate the technical changes agreed at the cost of the services.

The negotiations end with a review of the draft contract. If the negotiations fail, SCI Niger invites to negotiations the consulting firm whose offer was placed in second position and so on until the list was exhausted.

Storage System and Storage Capacity Consulting Firm

Conclusion of the contract

The contract is concluded once the negotiations are completed.

Annexes

Technical Submission Letter Template

(Name of consulting firm)

(Place and date)

Object : Technical Offer

TO

Mr. Country director of Save the
Children Niger.

After considering the terms of reference for the recruitment of a consulting firm for the evaluation and studies for storage systems and storage and distribution capacities for Pharmaceutical products in Niger, which we acknowledge, we have the honor to offer you our services.

We hereby submit to you our offer, which includes an administrative offer, a technical offer and an financial offer.

We commit ourselves based on this offer for a period of 90 days starting from the date fixed for the submission of the offers. The offer will continue to engage us and may be accepted at any time before the end of this period.

If our offer is retained, we commit to **begin immediately the proposed mission** as soon as the contract is signed and the order to commence the service and to **abide by the laws and regulations of the Republic of Niger**.

With our utmost consideration, yours faithfully,

Signature

First and last Name of Authorized representative

Letter of commitment and availability of specialized personnel (this letter must be legalized)

Certification

I, the undersigned-----(*Name, first name*) Born on----(*Date and place of birth*), certify, on my own behalf, to be available for the performance of all tasks and for the duration of the contract as an expert (*Specify specialization*) as included in the application submitted by (*Exact name* in connection with the recruitment of a firm to Evaluation and studies of the storage system, storage capacity and distribution of pharmaceutical products in Niger.

I certify that, as part of this offer, I offer my services exclusively on behalf of-----.

Signature of the declaring party

First and last Name

Letter of submission of the financial offer

(Name of bidder)
date)

(Place and

A

Director of Save the Children
Niger

Subject: Financial Offer

Mr. Director,

Following our technical offer for the evaluation and studies of the storage system, storage capacity and distribution of pharmaceutical products in Niger, we are pleased to send you our financial offer, which amounts to (amount in Letters and figures), excluding taxes (excl. VAT) and all taxes (VAT) to (amount in letter and figures).

This offer commits us in the same way as our technical offer.

Please accept, Mr. Director, the assurance of our distinguished consideration.

Signature

Name of authorized representative

Summary of costs according to the steps provided by the consulting firm

Posts (activities)	Cost	
	HT	TTC
Step or activity Group 1 (<i>Describe</i>)		
Step or Activity Group 2 (<i>Describe</i>)		
.....		
Total cost of the financial offer		

Cost details by activities:

This form is to be used for all the steps provided in the cost summary statement.

Activity Group: <i>Specify)</i>		
Cost element	Cost	
	HT	TTC
Staff compensation		
Other costs		
Subtotal		

a) Compensation details

This form is to be used for all the steps provided in the cost summary statement.

Activity Group: <i>Specify)</i>				
Name	Position	Rate/month	Time spent (Pers x months)	Amount excl. VAT (FCFA)
Key Personnel				
Support Staff				
Technical staff	Technical staff			
Administrative staff	Technical staff			
Total Cost				

NB: Key personnel should be indicated individually and support staff by category

b) Details of other fees

This form is to be used for all of the steps provided in the cost summary statement.

Activity Group: <i>Specify</i>				
Designation*	Unit	Unit Cost	Amount	Amount (CFA)
Logistics				
Transport				
Reprography				
Communication				
Other (Specify)				
Total Cost				

* *The list is not exhaustive*

5. SCI POLICIES

Policy Title:	Code of Conduct
Version:	1.0
Approved Date:	29 th January 2014
Approved by:	Madalyn Brooks, Chief of People Officer
Author:	Joan Coyle, HR Director
Review Date:	29 th July 2017

section I

I.1 POLICY STATEMENT

This policy - the Code of Conduct - applies to Save the Children International (SCI) employees, trustees, volunteers, interns, trainees, contractors and consultants and others who represent our organisation. The policy applies to us 24/7, 365 days a year, and is as relevant and applicable to our personal life as it is to our professional life. For this reason, all those who work for SCI or who represent the organisation in any capacity are required to sign a declaration confirming that they have read and understood the Code of Conduct and agree to comply with the requirements of the Code at all times.

- SCI is a rights based organisation. Those who work for SCI, in whatever capacity, endorse the concept of human rights in general and children's rights in particular, and commit to respecting those rights in all our decisions and actions.
- SCI's work is based on deeply held values and principles. It is essential that our commitment to children's rights and humanitarian principles is supported and demonstrated by all employees and other representatives. If any of us fails to act in a way that is consistent with our values and principles, we fail as an organisation.
- Our ability to achieve our aims, often in complex and insecure environments, is linked to our reputation. This reputation relies heavily on everyone who works for us upholding and promoting high standards of conduct. Working for SCI means you are accepting a special responsibility for safeguarding human rights in general and children's rights in particular.
- The basic values of SCI require that we observe the laws, customs and traditions of countries worked in or visited. In cases where such laws, customs or traditions contravene the UN Convention on the Rights of the Child and/or the Universal Declaration of Human Rights, these latter two shall prevail. They are founded on the conviction that all children and adults are of equal value, children have special rights and everyone has a responsibility to uphold those rights.
- If you are a manager, you have a particular responsibility to set a good example; and to create a working environment that supports employees and other representatives in

upholding these standards and that helps you to manage behaviour that breaches the Code of Conduct.

- With this common rights perspective, we strive for exemplary behaviour and the realisation of effective and reliable work for children's rights. We consider that it is of the utmost importance to ensure that all resources are used in an appropriate and effective way, be they personal or economic resources, and that they are used for the means for which they are designated.
- In order to make this Code of Conduct come alive within Save the Children, we must not only apply it individually but also be ready to bring to the attention of relevant senior managers within SCI any potential incident, abuse or concern that we witness or of which we are made aware.

Section 2

2.1 principles

The Code of Conduct requires that all those who work for SCI, in whatever capacity, sign up to and adhere to the principles set out in the statement below:

1. I will respect others:

- I will respect the basic rights of all human beings, regardless of gender, disability, ethnicity, religion, caste, language, HIV status and other aspects of identity. I will act fairly, honestly and tactfully in order to treat people with dignity and respect.
- I will not take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal), intimidation or exploitation, or in any other way infringe the rights of others.

2. I will work actively to safeguard children:

By carrying out my special responsibility for children to whom SCI has a duty of care and by creating a safe environment for children in order to prevent their physical, sexual or emotional abuse or neglect.

I will:

- Comply with all relevant policies and procedures
- Attend all required training
- Report any concerns about the welfare of a child or the behaviour of an adult

I will not:

- act in any way that breaches SCI's Child Safeguarding Policy and procedures or in any way places children at risk of harm;
- Withhold information about any current criminal convictions, charges or civil proceedings relating to child abuse, either when I join SCI or arising during my time of employment with SCI or during the period in which I am representing SCI in any capacity.

3. I will maintain high standards of personal and professional conduct:

By striving for high standards in my work, taking responsibility for my actions and not abusing my position of power as a representative of SCI. I will not behave in a way that undermines my ability to do my job or is likely to bring SCI into disrepute.

I will not:

- engage in sexual relations with anyone under the age of 18, or abuse or exploit a child in any way
- exchange money, employment, goods or services for sexual favours or engage in any form of sexual exploitation
- drink alcohol or use any other substances in a way that affects my ability to carry out my role or affects the reputation of the organisation
- be in possession of, nor profit from the sale of, illegal goods or substances
- ask for or invite any personal payment, service or favour from others, especially beneficiaries, in return for our help, support, goods or services of any kind
- accept bribes or significant gifts (except small tokens of appreciation) from governments, beneficiaries, donors, suppliers or others which have been offered as a result of my employment or other representational role with SCI
- enter into any sort of business relationship on behalf of Save the Children with family, friends or other personal/professional contacts for the supply of any goods or services to SCI or any employment related matters without authorisation.
- view, download, create or distribute inappropriate material, such as pornography, on SCI computer/systems, or any other computer systems, including my own personal property.

4. I will seek to protect the safety and wellbeing of myself and others:

- By being aware of and complying with local SCI health & safety and security policies and practices and highlighting any areas of concern to management.
- I will not behave in a way that causes unnecessary risk to myself or others.

5. I will protect Save the Children's Assets and Resources:

- By handling our financial and other resources carefully, ensuring that SCI's resources are not miss-used and protecting them from theft, fraud and damage.
- I will not release to others any private and confidential information relating to SCI (or for which we are responsible) unless legally required to do so.

6. I will report any incident or concern that relates to, or may relate to, a breach of this Code of Conduct.

- I recognise that in order to realise our ambitious goals for children, SCI must effectively report and respond to any fraud, misconduct or wrongdoing by our employees and representatives; and that employees/representatives are therefore expected to raise any concerns they may have about the conduct of others or the way we operate as an organisation.
- Therefore, I **will** raise any matter that I believe are in breach of – or may be in breach of - the Code of Conduct through the appropriate channels.

section 3

3.1 Supporting/RELATED documentation

Links to Supporting Documentation	
1.	UN Convention on the Rights of the Child UN Declaration of Human Rights UN Secretary-General’s Bulletin on the Prevention of Sexual Exploitation and Abuse
2.	SCI Child Safeguarding Policy
3.	SCI Whistleblowing Policy
4.	SCI Disciplinary Policy
5.	Personal Declaration form

PERSONAL DECLARATION

I confirm that I have read, understood and shall abide by the Code of Conduct principles for the entire period I am working or associated with, and or represent, Save the Children. I understand that violation of any of the above code of conduct can, depending on the degree of severity, result in immediate disciplinary action, which can include dismissal.

I will raise through appropriate channels any matter which appears to break the standards contained within this Code of Conduct

..... Job title

Signature

..... Date

Name in block letters

Policy Title:	Child Safeguarding Policy
Version:	1.0
Approved Date:	1 st February 2014
Approved by:	Madalyn Brooks, Chief People Officer
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Section I

I.1 POLICY STATEMENT

Children who meet Save the Children as a result of our activities must be safeguarded to the maximum possible extent from deliberate or inadvertent actions and failings that place them at risk of child abuse, sexual exploitation, injury and any other harm.

This responsibility falls upon all of our staff and representatives and is reflected across many policies. This duty of care is enshrined in our Child Safeguarding Policy.

The Policy requires:

- Save the Children to recruit only representatives who are suited to work with children and to apply strict child safe recruitment practices
- That everyone associated with the organisation is aware of their obligations and responds appropriately to issues of child abuse and the sexual exploitation of children.
- That anyone who represents our organisation behaves appropriately towards children and never abuses the position of trust that comes with being a member of the Save the Children family
- That everyone who represents the organisation must actively create a safe environment for children who come into contact with the organisation.
- All activities and programmes of work including during the response to Humanitarian emergencies are assessed for risks to children which are reduced or removed by all means within our control
- Central, Regional and Country Offices establish and maintain systems which promote awareness of Child Safeguarding, enable the prevention of harm, facilitate the reporting of and responding to safeguarding concerns.

In this way we make Save the Children *safe* for children and by creating a child safe organisation; we honour their rights and our aspirations.

Section 2

2.1 principles

The Child Safeguarding Policy is committed to and guided by the principles of:

- Personal responsibility. All representatives of Save the Children International must demonstrate the highest standards of behaviour towards children both in their private and professional lives. They have a responsibility to understand and promote the policy. They must do all that they can to prevent, report and respond appropriately to any concerns or potential breaches of the policy.
- Universality. The Policy includes mandatory requirements that apply to everyone in all aspects of Save the Children International's work regardless of how and where they work including during the response to humanitarian emergencies.
- Standards based approach. Save the Children has adopted a standards based approach to Child Safeguarding. Our safeguarding standards and standards of staff behaviour are often higher than those of the national laws and community custom or tradition. Nevertheless, it is our standards that representatives agree to when they join the Save the Children family and it is to these that they will be held account.
- Openness. We aim to create an environment in relation to child safeguarding issues, where any issues or concerns can be raised and discussed
- Transparency and accountability. This is essential in order to ensure that poor practice can be addressed, potentially abusive behaviour can be challenged and best practice promoted.
- Accountability to children and their communities. Through strengthening our internal systems, standards and practice we will be more accountable to the people we aim to serve.
- Children participation and non- discrimination. Children should be empowered to understand their rights in this area, and made aware of what is acceptable and unacceptable, and what they can do if there is a problem or a concern.
- The Best Interest of any children involved. When dealing with a Child Safeguarding concern, the best interest of the child will be our priority and we will strive to ensure their safety, health and well- being including meeting their emotional, psychological and physical needs.
- Confidentiality. All Child Safeguarding concerns/reports/ investigations will be dealt with on a need to know basis and all records will be held securely. Likewise, communication will be confidential and secure.
- Timeliness. Given the potential for increased or repeated abuse, timely responses are essential and the accompanying procedures establish mandatory time limits on reporting and responding to concerns.
- Compliance. The policy will be implemented in adherence with the Child Safeguarding Protocol of the Save the Children Association and Save the Children International 2010, the U.N.C.R.C.1989; The Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse 2003, the U.K. Charity Commissioners and with due consideration to the local legal frameworks.
- Uniformity. This policy applies both during, after and in between work hours.

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- **Ambition.** Save the Children aims to be able demonstrate that it is a leader in the field of safeguarding children.
- **Partnership.** We will work together with other agencies to promote Child Safeguarding within organisations and Child Protection within the wider community.

Section 3

3.1 definitions

Word/Term	Definition
Child	is defined as anyone under the age of 18 years ⁴
Child Safeguarding	<p>Within Save the Children, the term refers to the set of policies, procedures and practice that we employ to ensure that Save the Children itself is a child safe organisation.</p> <p>We know that harm can befall children as a result of deliberate actions by a tiny minority of staff and representatives. We have a zero tolerance to such behaviour and pursue rigorous policies to prevent and respond to these issues. We aim to ensure that everyone associated with the organisation is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children. We aim to ensure that anyone who represents our organisation behaves appropriately towards children both in work and outside work and never abuses the position of trust that comes with being a part of the Save the Children family.</p> <p>However, we also know that inadvertent actions, the lack of preventative actions and other failings on our part can and do sometimes have the unintended consequence of causing harm. Plus, preventable accidents can happen. We have seen examples of this across our developmental, humanitarian; fundraising, campaigning and advocacy work in every region where we work. Applying a safeguarding approach to the planning of programmes or in a myriad of other forms of engagement we have with children can be effective in mitigating and removing those risks.</p> <p>In other words, Safeguarding is our attempt to ensure that everything, which lies within our control, is done to ensure the safety and welfare of children that we work with.</p> <p>It helps in ensuring the rights of children within their communities are based on sound foundations. Some agencies continue to use the term Child Protection for this aspect of work, however, we have found it advantageous to differentiate between this and the broad scope of Child Protection work. UN agencies often refer to aspects of this work under</p>
	the term Prevention of Sexual Exploitation and Abuse (PSEA) as outlined in the U.N. Secretary General's Bulletin of 2003.
Child Abuse	<p>Child Abuse consists of anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood</p> <p>The main categories of abuse are defined by WHO as Physical Abuse,</p>

⁴ U.N. Convention on the Rights of the Child 1989

	<p>Emotional Abuse, Neglect and Negligent Treatment, Sexual Abuse, and Exploitation, Physical Abuse involves the use of violent physical force so as to cause actual or likely physical injury or suffering, (e.g. hitting, shaking, burning, female genital mutilation, torture.)</p> <p>Emotional or psychological abuse includes humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation. Sexual Abuse includes all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Child sexual abuse may also include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.</p>
Sexual Exploitation	<p>means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. ⁵</p>
Sexual Exploitation of a Child,	<p>The sexual exploitation of a child who is under the age of consent, is child sexual abuse and a criminal offence. An underage child cannot legally give informed consent to sexual activity. Save the Children considers that:</p> <ol style="list-style-type: none"> a. sexual activity with a child with or without their consent is child abuse and a crime e.g. rape, indecent assault; b. any sexual activity with a child who is under the legal age of consent of the country in which she/he lives and/or in which the offence occurs regardless of whether they consent is child abuse and a crime; c. consensual sexual activity with a child over the legal age of consent of the country in which she/he lives and/or in which the offence occurs, but below 18 years (although not a crime) will be dealt with as a breach of this Child Safeguarding Policy and the Code of Conduct.
The scope of this policy	<p>This Policy applies to:</p> <p>Save the Children International staff, whether national, international, full time, part time or engaged on short-term contracts, e.g. consultants, researchers etc.</p> <ul style="list-style-type: none"> • Staff • Members of SCI, Save the Children members and other representatives (other representatives); • Volunteers, trustees and board members, staff and representatives of partner agencies (including consortium partners) and any other individuals, groups or organizations who have a formal/contractual relationship with Save the Children International that involves any

⁵ Secretary General’s Bulletin Special Measures for Protection from Sexual Exploitation and Sexual Abuse 2003 ST/SGB/2003/13

	<p>contact with children (unless it is formally agreed that a partner organisation may enforce its own safeguarding or protection policy), referred to as “partners or staff of partner agencies”</p> <ul style="list-style-type: none"> • Donors, journalists, celebrities, politicians and other people who visit Save the Children programmes or offices in order to make contact with children must be made aware that this Policy applies to them while visiting our programmes or offices. (During this time they are referred to as “representatives”) • All of the above must act in accordance with this Protocol in both their professional and their personal lives. <p>Breaches in the policy can lead to disciplinary action including possible dismissal. For partners/contractors breaches can lead up to and including termination of relation including contractual & partnership agreement. Where relevant, the appropriate legal or other frameworks as per the national laws will be referred to.</p>
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3.2 Supporting/RELATED documentation

Links to Supporting Documentation	
1	A Sample List of Unacceptable Behaviour for Save the Children Representatives, both in Personal Life and Professional Life.
2	Code of Conduct https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/HR%20Management/SCI_HRM_POL_CodeOfConduct_EN.docx
3	Whistle Blowing Policy https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/HR%20Management/SCI_HRM_PRC_Whistleblowing_EN.doc
4	<p>Key Reference Documents</p> <ul style="list-style-type: none"> • Child Safeguarding Policy https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_POL_Child%20Safeguarding%20Policy_EN.docx • Code of Conduct https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/HR%20Management/SCI_HRM_POL_CodeOfConduct_EN.docx <p>Management Roles</p> <ul style="list-style-type: none"> • TOR Child Safeguarding Focal Point https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_CS_FocalPointsTOR_EN.doc • Global Guidance for Dealing with Cases of Abuse and Exploitation https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_Standard13AppendixB_EN.docx

- Child Safeguarding roles in Job Descriptions
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_TOL_CSResponsibilitiesForJDs_EN.doc
- T.O.R. Crisis Management Team
- Child Safeguarding Budgeting Tool

Awareness, Induction and Training

- Country Office Training of Trainers
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_EAfricaOctParticipantsAgendaTOT_EN.doc
- Country Office Training of Child Safeguarding Focal Points
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_PanamaCSFPTtrainingParticipantsAgenda_EN.docm
- Country Office Introductory Training Materials
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_ConceptForChildFriendlyMaterial_EN.docx
- Child safeguarding in Emergencies and Humanitarian Crises : Keeping Children Safe
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/Child%20Safeguarding%20in%20emergency_pocket_guide.pdf
- Partners Training: Keeping Children Safe www.keepingchildrensafe.org.uk
- Guidance on Cultural Challenges on physical punishment; physical punishment in education, early marriage; child labour; Female Genital Mutilation
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_FGMSummary2009_EN.docx

Awareness Raising Material

- Awareness Raising Material Adults
- Awareness raising Material 13-18 years
- Awareness raising Material 8-13 years
- Awareness raising Material 5- 8 years

Country or Local Procedures

- Guidance for Country Directors on how to establish Country or Local Procedures and how to undertake a Mapping Exercise.
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_WhatWeShouldKnowFeelAboutCS_EN.docx

Risk Assessment and Mitigation

- Sample Risk Assessment logs
https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_PR_C_EstablishingManagingEffectiveChildSafeguardingStandardII_EN.docx

Visitors

- Sample PDI statement

https://onenet.savethechildren.net/sci/security/Lists/pre_departure/AllItems.aspx

Partners, Contractors and Sub Grantees

- Sample simplified policy for inclusion in contracts

https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_CSBriefingForVisitorsToCOAndProgrames_EN.docx

- Keeping Children Safe Training materials: www.keepingchildrensafe.org

- Partnership Assessment Tool/Framework

[https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_SimplifiedCSPolicyForSuppliersContractorsAndOthers_EN%20\(002\).doc](https://onenet.savethechildren.net/tools/QualityFramework/QFDocuments/Child%20Safeguarding/SCI_CS_GUI_SimplifiedCSPolicyForSuppliersContractorsAndOthers_EN%20(002).doc)

Annex I

Sample List of Unacceptable Behaviour

Staff, partners and other representatives must never:

1. Hit or otherwise physically assault or physically abuse children.
2. Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defence.
3. Develop relationships with children which could in any way be deemed exploitative or abusive
4. Act in ways that may be abusive in any way or may place a child at risk of abuse.
5. Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
6. Behave physically in a manner which is inappropriate or sexually provocative
7. Have a child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from their line manager
8. Sleep in the same bed as a child with whom they are working
9. Sleep in the same room as a child with whom they are working unless exceptional circumstances apply and previous permission has been obtained from their line manager
10. Do things for children of a personal nature that they can do themselves
11. Condone, or participate in, behaviour of children which is illegal, unsafe or abusive
12. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
13. Discriminate against, show unfair differential treatment or favour to particular children to the exclusion of others.
14. Spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate
15. Expose a child to inappropriate images, films and websites including pornography and extreme violence
16. Place themselves in a position where they are made vulnerable to allegations of misconduct

(This is not an exhaustive or exclusive list. Staff, partners and other representatives should at all times avoid actions or behaviour which may allow behaviour to be misrepresented, constitute poor practice or potentially abusive behaviour.)

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section I

I.1 POLICY STATEMENT

Save the Children International (SCI) has a **“zero tolerance”** policy towards fraud, bribery and corrupt practices (see definitions below).

All SCI employees, partners and vendors have a duty to protect the assets of SCI and to comply with relevant laws (including the UK Bribery Act 2010).

SECTION 2

2.1 principles

2.1.1 SCI's policy on Fraud, Bribery and Corruption is guided by the principles of:

- Integrity – SCI will act in a principled and honest fashion.
- Legitimacy – SCI will abide by all applicable laws relating to fraud, bribery and corruption.
- Timeliness – SCI staff will report suspicions of fraud, bribery or corruption in a timely manner.
- Fairness – SCI will investigate allegations of fraud, bribery or corruption in an even-handed way.

2.1.2 SCI maintains systems and procedures to ensure that the risks of fraud, bribery and corrupt practices are minimised and that any incidents are detected, investigated, reported and dealt with effectively where they do occur.

2.1.3 Where fraud, bribery or corrupt practices are detected, SCI will investigate and take appropriate action against staff, consultants, volunteers, partners, vendors and any other implicated party.

- 2.1.4 SCI staff, consultants, contractors, secondees, interns and volunteers **must immediately report** any suspicion of fraud, bribery or corrupt practices to the Country Director (if at country office), to the Regional Director (if at regional office) or to a member of the senior leadership team (if at the centre).
If they do not feel able to report directly to their Country Director, staff can report to their line manager or to scifraud@savethechildren.org.
For further details about how to report, please see the [Fraud, Bribery and Corruption Procedure](#).
- 2.1.5 Failure to report fraud, bribery or corruption will be treated as a serious issue and may result in disciplinary measures being taken.
- 2.1.6 Attempted fraud, bribery or corruption will be treated with the same seriousness as actual fraud, bribery or corruption under this policy.
- 2.1.8 **Partners and suppliers** must report to SCI and take action against fraud, bribery or corruption occurring in their organisation and **must immediately report** to their contact at SCI (or the relevant SCI Country Director) any suspicion of fraud, bribery or corruption within SCI.

section 3

3.1 definitions

Word/Term	Definition
<p>“Bribery” or “corrupt practices” or “corruption”</p>	<p>Offering, giving, receiving or soliciting a financial or other advantage in connection with the performance of a position of trust or a function that is expected to be performed impartially or in good faith.</p> <p>Behaviour which amounts to bribery and corrupt practices includes but is not limited to:</p> <ul style="list-style-type: none"> • <u>Paying or offering a bribe</u> – where an individual improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another person in order to influence their conduct in any way. • <u>Receiving or requesting a bribe</u> – where an individual improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence his or her conduct in any way. • <u>Receiving a so-called ‘graft’ or ‘facilitation’ payment</u> – where an individual improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway. For example: where a member of staff at a partner refuses to issue the required travel authorisations without a personal payment also being made. • <u>Nepotism or patronage</u> – where an individual improperly uses their employment to favour or materially benefit friends, relatives or other

	<p>associates in some way. For example, through the awarding of contracts, jobs or other material advantages.</p> <ul style="list-style-type: none"> • <u>Embezzlement</u> - where an individual improperly uses funds, property, resources or other assets that belong to SCI or a connected organisation or individual. For example, a member of staff using building contractors who have been employed to work on a SCI project to work on their own personal property. • <u>Receiving a so-called 'kick-back' payment</u> – where an individual improperly receives a share of funds or a commission from a supplier as a result of their involvement in a corrupt bid or tender process. • <u>Collusion</u> – where an individual improperly colludes with others to circumvent, undermine or otherwise ignore SCI’s rules, policies or guidance. For example, where an individual tries to fix the level of a tender in order to bring it below a certain threshold which has been set by SCI. • <u>Abuse of a position of trust</u> – where an individual improperly uses their position within SCI or a connected organisation to materially benefit themselves or any other party. For example, an individual intentionally accessing confidential material they are not entitled to or passing confidential information (such as the contents of a tender bid) to a third party.
<p>“Fraud”</p>	<p>An act of deception intended for personal gain or to cause loss to another party (even if no such gain or loss is in fact caused). Behaviour which amounts to fraud includes but is not limited to:</p> <ul style="list-style-type: none"> • False invoicing – where an individual knowingly creates or uses invoices that are false in any way. • Expenses fraud - where an individual dishonestly uses the expenses system to pay money or other benefits that the recipient is not entitled to. • Procurement fraud - where an individual engages in any dishonest behaviour relating to procurement or tendering process, e.g. falsely created bids or quotes. • Supply chain fraud - where an individual misdirects or steals goods, forges stock records, or creates fictitious companies through which to channel payments. • Payroll fraud - where an individual dishonestly manipulates the payroll system to make unauthorised payments to him or herself or another. For example, by creating 'ghost' employees or dishonestly increasing one’s own salary.

	<ul style="list-style-type: none"> • Tax or duty evasion – where an individual knowingly avoids payment of a tax or other duty that he or she is aware should be paid. • False accounting - where an individual deliberately enters false or misleading information into any form of accounting or financial record. • Forgery - where an individual dishonestly creates or alters a document so that the information contained in it is incorrect or in any way misleading. • Bank or cheque fraud - where an individual dishonestly manipulates any banking system or record (such as a cheque, bank statement or electronic transfer). • Brand fraud - where an individual dishonestly uses Save the Children’s name, branding or documentation for unauthorised or illegitimate ends. • Conflict of interest - where an individual knowingly has an undisclosed business interest in an entity involved in a commercial relationship with Save the Children. • Theft – where an individual dishonestly takes or appropriates any item of property that belongs to another.
<p>“Individual”</p>	<p>In the definitions above this may include but is not limited to an employee, consultant, contractor, intern, secondee or volunteer of SCL, it’s implementing partners and suppliers.</p>

3.2 Supporting/RELATED documentation

<p>Links to Supporting Documentation</p>	
<p>I.</p>	<p>Fraud, Bribery and Corruption Procedure</p>