Anti-Fraud and Anti-Corruption Policy

INTEGRITY, RESPONSIBLE STEWARDSHIP AND ZERO TOLERANCE

Policy code	RYO/POL/01/2026
Document status	DRAFT TEXT - NOT YET RATIFIED
Policy titles endorsed	02 November 2026
Text approval date	Pending Board ratification

1. Purpose and commitment

Rawdah Youth Organization (RYO) prohibits bribery, corruption, fraud, embezzlement, extortion, collusion, falsification, diversion of assistance and misuse of organisational property. RYO will take proportionate preventive and corrective action wherever there is a credible concern. Its resources must serve approved activities and the people for whom they are intended.

2. Scope and responsibilities

This policy applies to Board members, officers, employees, volunteers, interns, consultants, vendors and partners when they act for or on behalf of RYO. The Board oversees integrity and major incidents; the President sets institutional expectations; the Head of Administration and Operations implements control measures, without overriding independent review arrangements.

3. Prohibited conduct

The following conduct is prohibited whether a benefit is offered, requested, received or promised directly or through an intermediary:

- Offering or receiving money, gifts, hospitality or favours to obtain an improper advantage, including facilitation payments.
- False invoices, duplicate claims, unsupported expenditure, inflated attendance or training records and fabricated results.
- Diverting cash, equipment, scholarships, materials or programme benefits for personal or political use.
- Undisclosed arrangements with related parties, collusive procurement or manipulation of beneficiary selection.
- Retaliation against a person who raises a concern in good faith or supports an investigation.

4. Prevention and internal controls

RYO shall use documented budgets, pre-authorised spending, verifiable procurement, appropriate separation of duties, an asset register, donor-restricted accounting and periodic bank reconciliation. Personnel may not approve their own claims or select suppliers in which they hold an undisclosed interest.

- Apply transparent supplier selection and retain quotations, evaluation notes, approvals, invoices and receipts.
- Record payments accurately; use organisational channels rather than private accounts unless documented exceptional approval is lawful.
- Verify beneficiary eligibility and service delivery using proportionate evidence without collecting unnecessary personal data.

- Screen high-risk partners and funding sources; document risk decisions and any agreed mitigating measures.

5. Gifts, hospitality and conflicts

No gift or hospitality may influence, or appear reasonably to influence, an RYO decision. Cash gifts and kickbacks are prohibited. Modest ceremonial hospitality, if permitted, must be declared and recorded. Related-party transactions require prior disclosure, independent assessment and approval by non-conflicted decision-makers.

6. Reporting and response

Any person may report a suspected violation promptly through RYO's designated confidential reporting process. Reports will be logged, risk-assessed, preserved securely and referred for an impartial examination. Persons involved in the allegation shall not supervise the review. RYO shall respond proportionately, protect whistleblowers from retaliation and report to donors or competent authorities when law or funding agreements require it.

7. Outcomes, records and review

Confirmed misconduct may lead to recovery of funds, disciplinary measures, contract termination, referral to authorities or donor notification as applicable. All action must respect due process, data protection and contractual rights. The Board shall review this policy at least annually and after a significant incident.

8. Reporting contact

General integrity queries may be directed to info@rawdahyouth.org. Before publication, RYO must publish and test a separate confidential reporting channel and an escalation route for allegations involving senior leadership. Do not include sensitive evidence in an unsecured public email.

Implementation note

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Reference guidance

- Core Humanitarian Standard (2024): https://handbook.corehumanitarianstandard.org/en/chs/2024
- Transparency International - Conflict of Interest Policy: https://www.transparency.org/en/the-organisation/conflict-of-interest-policy

Code of Conduct

EXPECTED BEHAVIOUR FOR EVERYONE REPRESENTING RAWDAH

Policy code	RYO/POL/02/2026
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1. Our standard

All RYO representatives must act with honesty, respect, impartiality and diligence. The Code applies during training, outreach, recruitment, travel, meetings, virtual communications and any other activity connected to RYO. Signing a contract or joining the Board does not remove these duties.

2. Respect and non-discrimination

Treat learners, beneficiaries, colleagues and partners with dignity regardless of gender, disability, age, language, origin, social status or other personal characteristics. Bullying, harassment, intimidation, humiliation and discriminatory denial of services are prohibited.

3. Professional boundaries and safeguarding

Do not abuse position, influence, access to training, recommendations, scholarships or employment referrals. Sexual exploitation and abuse, sexual harassment and sexual activity with children under 18 are prohibited. Staff working with young people shall observe the Safeguarding and PSEA/SEAH policies, including safe communication and supervision.

4. Integrity and resources

Use RYO property, budgets, vehicles, equipment, information and working time only for authorised purposes. Do not accept kickbacks, demand unofficial payments, falsify credentials or use the RYO name to solicit private business. Declare financial and personal conflicts before acting.

5. Personal data and communications

Protect student records, identification documents, health data and other confidential information. Obtain permission before photographing or identifying programme participants, with stronger safeguards for children. Do not publish sensitive information on social media or send it through personal messaging groups without authorisation.

6. Reporting and cooperation

Raise concerns promptly through appropriate reporting channels. Cooperate with fair fact-finding, preserve relevant records and avoid retaliation. A person subject to a complaint is entitled to respectful and impartial procedures.

7. Acknowledgement and consequences

Staff, volunteers, consultants and Board members shall receive or be provided with this Code and confirm that they understand it. Breaches may result in coaching, disciplinary action, termination or referral to authorities as appropriate. This Code should be reviewed annually.

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Reference guidance

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- UN Partner Portal - PSEA organisational policy resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12969957776023-Core-Standard-1-Organisational-Policy

Conflict of Interest Policy

DISCLOSURE, RECUSAL AND IMPARTIAL DECISIONS

Policy code	RYO/POL/03/2026
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1. Purpose

RYO decisions must advance its charitable and educational mission rather than private interests. A conflict exists when a personal, family, professional, financial or organisational interest could interfere with, or reasonably appear to interfere with, independent judgement. A conflict is not automatically misconduct; concealing or mismanaging it can be.

2. Who is covered

All Board members, delegated representatives, employees, volunteers, consultants and persons participating in procurement, recruitment, admissions, scholarships or grants must disclose relevant conflicts.

3. Common examples

Conflicts include, without limitation:

- Selecting or supervising a close relative or business partner without transparent controls.
- Awarding a procurement contract to a firm owned by an officer, family member or close associate.
- Using confidential scholarship, donor or beneficiary information for private gain.
- Directing learners to a paid private service operated by an RYO insider without disclosure.
- Participating in Board decisions about one's own remuneration, performance or contractual arrangement.

4. Disclosure and register

Covered persons shall declare relevant interests on appointment, once each year, and immediately when a new conflict arises. The Secretary or authorised governance custodian shall maintain a restricted Conflict of Interest Register. Declarations should describe the interest, affected decision, relationship and proposed safeguard.

5. Decision-making procedure

The conflicted person must notify the meeting chair before discussion, leave the relevant deliberation where appropriate, refrain from voting or influencing others, and allow a non-conflicted quorum to decide. The minutes shall record the declaration and mitigation; sensitive personal details are kept in a restricted annex.

6. Related-party transactions

Such transactions require documented evidence of necessity, fair market value and alternatives. Independent approval must be recorded in advance. If disinterested decision-making cannot be assured, the transaction shall not proceed until independent advice or an alternative procedure is arranged.

7. Breach, confidentiality and review

Suspected concealment may be reported under the Whistleblowing Policy. Records shall be kept securely; only necessary details should be released. The Board shall review unresolved conflicts and this policy annually.

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- Core Humanitarian Standard (2024): https://handbook.corehumanitarianstandard.org/en/chs/2024

Safeguarding Policy

PROTECTION OF CHILDREN AND ADULTS AT RISK

Policy code	RYO/POL/04/2026
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1. Commitment

RYO is committed to providing safe education, youth development, community and employment-readiness activities. Safeguarding means taking reasonable steps to prevent harm, abuse, exploitation, neglect and inappropriate conduct linked to RYO activities. A child is anyone below 18 years of age for this policy.

2. Coverage and leadership

The policy applies to all programmes, online activity, field visits, staff, volunteers, Board members and delivery partners. The Board oversees safeguarding; an operational Safeguarding Focal Point shall be designated in writing and adequately trained before this policy is publicly launched.

3. Prevention measures

RYO shall apply proportionate screening, reference checks where lawful, induction and supervision for persons working with children or at-risk adults. Programme planning must consider physical security, transport, accessible complaints channels, privacy and gender-sensitive participation.

- Avoid unsupervised one-to-one meetings with children in isolated spaces; use visible and approved settings.
- Obtain appropriate consent and assent for photography, interviews, travel and sharing personal stories.
- Do not share personal contact information or communicate privately with learners in inappropriate ways.
- Ensure staff know how to respond to disclosure without interrogating the person concerned.

4. Prohibited behaviour

Physical, emotional or sexual abuse; exploitation; humiliating punishment; neglect; grooming; coercion; harassment; and retaliatory behaviour are prohibited. Staff must never exchange training access, referrals or benefits for personal or sexual favours.

5. Receiving a concern

Listen calmly, take immediate steps to protect safety, record only the necessary facts in the person's own words, and refer through the designated confidential safeguarding mechanism. Do not promise absolute secrecy, investigate personally, confront an alleged offender or disclose the case widely.

6. Survivor-centred action and referrals

Decisions shall prioritise safety, dignity, informed choices, age-appropriate participation and confidentiality. RYO will identify qualified local protection, medical and psychosocial services and refer

cases in accordance with consent, best interests of the child and applicable reporting duties. Emergency threats require prompt contact with appropriate local services.

7. Case management, partners and review

Allegations shall be handled by trained, impartial persons and recorded with restricted access. Partners must be informed of minimum safeguarding obligations. The Board will review training, complaints trends and risk mitigation at least annually without publishing identifying case details.

8. Contacts to activate

Before publication, appoint and publicise a Safeguarding Focal Point, an independent escalation contact, a confidential channel, and a verified local referral directory. General information: info@rawdahyouth.org. The general information inbox is not a substitute for a tested confidential incident mechanism.

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- UN Partner Portal - PSEA organisational policy resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12969957776023-Core-Standard-1-Organisational-Policy
- UN Partner Portal - PSEA reporting resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12970000875159-Core-Standard-5-Reporting

PSEA and Sexual Harassment Policy

PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT

Policy code	RYO/POL/05/2026
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1. Zero-tolerance commitment

RYO prohibits sexual exploitation and abuse (SEA) and sexual harassment (SH) in all its operations, whether committed by staff, officers, volunteers, consultants or other persons acting on RYO's behalf. Suspected violations receive prompt, fair and survivor-centred attention. SEA and SH are serious misconduct and may lead to termination and referral to authorities.

2. Definitions

Sexual exploitation is actual or attempted abuse of vulnerability, differential power or trust for sexual purposes. Sexual abuse is actual or threatened sexual intrusion under force, coercion or unequal conditions. Sexual harassment is unwelcome sexual conduct that undermines dignity or creates an intimidating, hostile or offensive environment. These categories may overlap.

3. Mandatory rules

Consistent with inter-agency principles, RYO requires the following:

- Sexual activity with a person under 18 is prohibited irrespective of local age of consent; mistaken belief about age is no defence.
- No exchange of money, grades, employment referrals, training, gifts, aid or services for sex or sexual favours.
- No exploitation of a beneficiary or learner; sexual relationships affected by a significant power imbalance are forbidden where they involve improper use of position.
- Staff must promptly report good-faith concerns or suspicions through the appropriate confidential mechanism.
- Managers must actively prevent SEA/SH and ensure safe reporting and training.

4. Recruitment, conduct and partner duties

Recruitment and contracting will include appropriate safeguarding checks and clauses; personnel will receive induction and refresher training. RYO will communicate prohibitions and complaint options to participants in accessible language. Vendors and partners must apply equivalent safeguards or comply with written RYO requirements.

5. Reporting and protection

Complaints may be made by survivors, witnesses or others and may be anonymous. RYO must provide more than one safe reporting route, including an option that bypasses anyone implicated. It will not retaliate against people reporting in good faith. Reports will be shared only on a need-to-know basis; anonymity cannot always be guaranteed during formal proceedings.

6. Immediate assistance and response

First protect the survivor from further harm. Offer available medical, psychosocial, safety and legal referral information without forcing a choice. Where children are involved, follow age-appropriate child-protection procedures. Assessment and investigations must be conducted by trained and impartial people with attention to due process.

7. Donor and authority notifications

RYO shall assess contractual and legal obligations to report serious incidents to the relevant donor or competent authority, with due regard to confidentiality, safety and survivor preferences. No person implicated in a complaint may control its disposition.

8. Operational readiness before publication

Appoint a PSEA Focal Point; verify confidential and independent reporting routes; map referrals; provide staff training; confirm survivor-centred recordkeeping; and communicate these mechanisms to beneficiaries. These arrangements must be operational, not merely described on the website.

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Reference guidance

- UN Partner Portal - PSEA organisational policy resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12969957776023-Core-Standard-1-Organisational-Policy
- UN Partner Portal - PSEA reporting resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12970000875159-Core-Standard-5-Reporting
- IASC principles via UNHCR: https://data.unhcr.org/en/documents/details/110421

Whistleblowing and Complaints Policy

SAFE DISCLOSURE, FAIR HANDLING AND NON-RETALIATION

Policy code	RYO/POL/06/2026
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1. Purpose and scope

RYO welcomes reports of suspected fraud, corruption, abuse, safeguarding concerns, sexual exploitation, harassment, conflicts of interest and serious breaches of policy. This policy applies to staff, volunteers, beneficiaries, Board members, vendors, partners and other people affected by RYO activities.

2. Good-faith disclosures

A concern may be raised where the person reasonably believes misconduct may have occurred. Conclusive evidence is not required. Reports made in good faith are protected from retaliation even if concerns are not substantiated; deliberately false or malicious allegations may be addressed through fair procedures.

3. Reporting routes

RYO must offer accessible, confidential reporting by written submission, conversation with a designated trained officer and an alternative route to a non-conflicted Board representative. Anonymous reporting shall be accepted where feasible. Detailed contact details shall be published only once checked and operational.

- General enquiries: info@rawdahyouth.org (not designed for confidential allegations).
- Confidential reporting channel: [DESIGNATE AND TEST BEFORE RELEASE].
- Independent escalation route if senior leadership is involved: [DESIGNATE BEFORE RELEASE].

4. Handling a report

An authorised impartial recipient shall acknowledge the report where contact details are provided, assess immediate protection risks, preserve records securely, screen for conflicts of interest and determine whether an investigation or referral is appropriate. Serious safeguarding and PSEA complaints follow their specialised procedures.

5. Fairness, confidentiality and response

Information shall be shared strictly on a need-to-know basis. The person concerned by an allegation is entitled to a fair process. RYO shall offer progress information where appropriate, without compromising confidentiality. Findings and action shall be documented, and legal or donor reporting obligations followed.

6. Protection from retaliation

No reporter, witness or person supporting fact-finding may be threatened, dismissed, disadvantaged or harassed for a good-faith report. Any allegation of retaliation shall be independently assessed and may lead to disciplinary action.

7. Oversight, learning and limitations

The Board shall receive anonymised trend reports and ensure that complaints involving a Board member are handled independently of that person. RYO should test channels periodically, maintain restricted records and improve accessibility for women, children, persons with disabilities and people not using email. Urgent threats require contact with competent emergency or protection services.

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- UN Partner Portal - PSEA reporting resources: https://supportcso.unpartnerportal.org/hc/en-us/articles/12970000875159-Core-Standard-5-Reporting

Data Protection and Privacy Policy

HOW RAWDAH HANDLES PERSONAL INFORMATION

Policy code	RYO/POL/07/2026
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Text approval date	Pending Board ratification

1. Who we are and what this notice covers

Rawdah Youth Organization (RYO), Mogadishu, Somalia, runs educational, vocational training, youth-development and community programmes. This policy explains the intended handling of personal data collected through applications, attendance records, scholarships, training, surveys, website forms, partnerships and correspondence. It is drafted with reference to Somalia's Data Protection Act No. 005 (2023) and guidance issued by the Somalia Data Protection Authority.

2. Categories of information

Depending on the programme, RYO may process names, contact details, age, educational records, language assessments, work history, attendance, photographs (where authorised), identity-document information needed for lawful programme administration and limited sensitive information necessary for safeguarding or accessibility support. RYO shall avoid unnecessary sensitive data.

3. Purposes and lawful basis

Personal data shall be used for specified purposes such as delivering training, assessing eligibility, monitoring attendance, issuing certificates, communicating opportunities, fulfilling grant reporting, responding to complaints and meeting legal obligations. RYO must identify and document an appropriate lawful basis for each purpose; consent shall be sought where required and shall be meaningful, informed and freely given.

4. Sharing and international transfers

RYO may share limited necessary information with contracted instructors, service providers, programme funders, educational institutions and public authorities where lawful. Where information is transferred outside Somalia, including to Italy or other countries for educational opportunities, RYO shall assess applicable transfer requirements, transparency obligations, data minimisation and appropriate safeguards. Data will not be sold.

5. Security and retention

Authorised access shall be role-based; digital records protected by strong authentication and secure storage; and paper files kept securely. Retention periods must follow a documented schedule that reflects purpose, law and donor obligations, after which records are safely deleted or anonymised. Identifiable safeguarding cases require heightened restrictions.

6. Children, images and online activity

Children's information receives special protection, including age-appropriate communication and parental or guardian involvement where required. Photographs, testimonials and publication of

learners' names require suitable permissions. The website shall separately describe any actual cookies or analytics tools used; RYO must not claim to use or not use tools that have not been technically checked.

7. Data rights and concerns

Individuals may ask about their information and exercise applicable rights, including access, correction, objection, restriction or erasure, subject to lawful exceptions. Requests may be sent to info@rawdahyouth.org. RYO will verify identity proportionately and respond within the applicable legal deadlines. Individuals may also contact the Somalia Data Protection Authority.

8. Personal data incidents

Suspected loss, misuse or unauthorised disclosure must be reported immediately to the designated internal contact. RYO shall contain the incident, assess potential harm, preserve evidence, document decisions and notify the regulator or affected persons within applicable legal deadlines where required. Legal and technical verification is needed before this text is published as a final privacy notice.

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Reference guidance

- Somalia Data Protection Authority - Guidance: https://dpa.gov.so/guidance-2/

Financial Integrity and Banking Controls - Public Statement

PUBLIC TRANSPARENCY STATEMENT; NOT A BANKING SIGNATORY MANUAL

Policy code	RYO/POL/08/2026
Document status	DRAFT TEXT - NOT YET RATIFIED
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1. Scope

This public statement summarises the financial integrity safeguards that RYO intends to apply. The detailed Banking and Signatory Policy, bank mandates, authorised signatory lists, authentication methods and internal payment thresholds are confidential operational records and are not included here.

2. Stewardship and responsibility

The Board of Directors oversees financial accountability. Management is responsible for accurate books, documented expenditure and proper implementation of approved budgets. Persons initiating expenditure shall not, where practicable, be the only persons approving, paying and reconciling the same transaction.

3. Controls in principle

RYO shall document approved budgets and payment requests, maintain transaction records and supporting documents, apply dual or independent authorisation when risk warrants, reconcile bank statements independently and restrict access to banking systems. Grants earmarked for specific purposes shall be tracked and reported accordingly.

4. Integrity in banking and procurement

The Organisation prohibits private diversion of donor funds, unrecorded accounts, false invoices, undisclosed personal benefit and improper supplier selection. Any exceptional financial arrangement must be documented, justified, approved within the relevant delegation and compliant with law and donor agreements.

5. Oversight and transparency

Financial records shall be reviewed periodically and audit or independent verification arranged when required. RYO will provide appropriate financial assurances to authorised donors and regulators without exposing sensitive account credentials, security procedures, personal banking details or the private details of signatories on its public website.

6. Public enquiries

General questions concerning financial integrity may be addressed to info@rawdahyouth.org. Suspected fraud or abuse should follow a functioning confidential reporting process rather than be sent with sensitive attachments to the general information inbox.

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