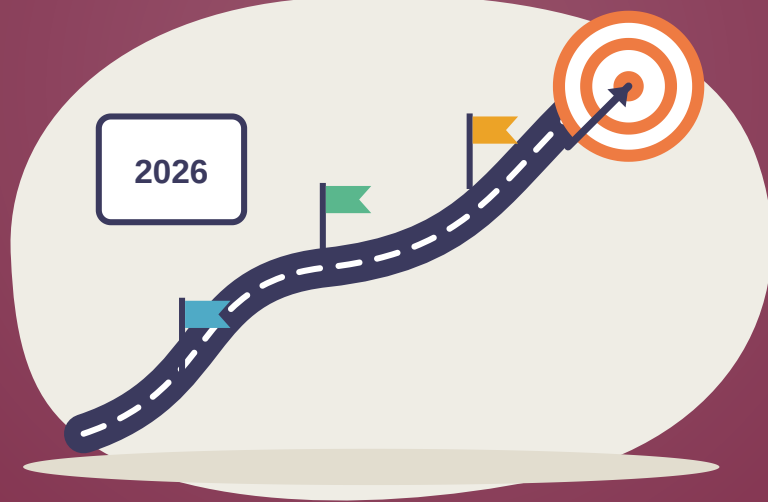




General Risk Management Policy

POLICY NO.

003

Centre de Recherche sur l'Anti-Corruption (CERC)

CERC policies and procedures

Purpose

Helping young people in the Democratic Republic of the Congo to hold their government to account carries many inherent risks, but CERC is committed to being aware of all the risks involved and to avoiding, mitigating or carefully accepting them, as appropriate.



The purpose of this policy is to describe the strategy adopted by the Centre de Recherche sur l'Anti-Corruption ("CERC") to deal with risk at every level of the organisation's work, both at its head office and in its programmes abroad. Through risk management, CERC seeks to make informed decisions, to prevent any harm to the organisation or its representatives, to maintain a positive reputation as a leader in the field of transparency and accountability, and to remain in good standing with the law and with all its stakeholders.

Risk management is not a stand-alone activity but one element, alongside planning and project and performance management, of effective governance and management. This policy goes hand in hand with CERC's other governance documents, in particular its anti-corruption and anti-fraud policy, its code of conduct and other internal processes. It aims to ensure that risks do not disrupt the achievement of CERC's missions, which are **"to advance knowledge of the causes and consequences of corruption and to support the development of new anti-corruption policies and initiatives in the Democratic Republic of the Congo"** and **"to empower young people, through education and training, mentoring and technical support, to build a culture of transparency and accountability in communities where institutions, public services and development projects are riddled with corruption"**, nor of the strategy put in place to achieve these two missions.

Responsibilities

As the main decision-making body of the Centre de Recherche sur l'Anti-Corruption, the Executive Management is responsible for the risk management policy and for its implementation through an effective system of internal control.

All CERC employees must ensure that, in the course of their work with CERC, they do not threaten CERC's integrity or reputation, and that they act in good faith at all times to support CERC's strategy and the risk management principles set out in this policy. CERC employees are strongly encouraged to analyse the risks related to their work continuously and to report them to the Executive Management, so that this policy remains accurate and up to date.

Process

CERC's management analyses and monitors the organisation's risk register, rates these risks on a scale from low to high and regularly decides on strategies to deal with them. Some will be handled through routine management, internal systems, procedures and policies; others will require specific action or external support. CERC regards risk management as an important learning process and seeks to improve continuously.

Main risk areas and guidelines

1

Operational risk

The risk of losing the ability to operate because of internal or external events, such as a natural disaster, the departure of an employee or a lack of resources to meet commitments. CERC addresses these risks as follows:

- maintaining **security policies** for each province in which it operates, updated by local staff every quarter, or sooner if a high-risk situation arises;
- carrying out a staff survey and staff appraisals every year, to give staff the opportunity to give and receive constructive feedback, to identify problems to be solved and to strengthen staff motivation;
- assessing and analysing the risks of expanding into a new region, on the basis of local knowledge and specialist resources, using our **context selection matrix**, and obtaining the Board's approval for the expansion;
- hiring local people who truly understand the province and, whenever we are in the province, working in tandem with them.

Accepted operational risk

CERC demonstrated its ability to adapt to difficult situations during the Covid-19 pandemic. We recognise that similar crises may arise and put part of our work on hold.

2

Personal risk

The risk of harm or injury to team members, particularly when travelling abroad or in an unfamiliar environment. CERC addresses these risks as follows:

- ensuring that every employee who travels or works abroad receives training and advice on security issues and signs a **waiver** approved by our legal adviser;
- seeking external training on staff risks when funds allow, and not requiring staff to undertake travel that puts them in undue danger.

Accepted personal risk

Local transport in other provinces, such as the Beni area, can be risky. CERC employees are therefore responsible for using their judgement as to which means of transport are safe and which situations should be avoided. Our employees are responsible for ensuring the safety of their colleagues in the field.

3

Reputational risk

The risk that our brand is tarnished or discredited by a destructive media campaign, that someone copies our work in a careless way, or that our employees do not all demonstrate our values. Because of this risk, it could become difficult for us to obtain funding, to hire new talent or to attract people to take part in our programmes. CERC deals with these risks by implementing the following measures:

- signing memoranda of understanding and licence agreements with all partners;
- adding a copyright notice at the bottom of all key programme resources and marketing materials;
- storing the passwords of our website and social media channels securely, carefully limiting the number of people who have access to them and implementing regular digital security updates;

- stating whether communications and programmes are carried out on behalf of the CERC office;
- not accepting donations from companies or organisations whose reputation is associated with corruption or other issues that conflict with our organisation's values.

Accepted reputational risk

We do not register trademarks for our organisation or our programmes, because of the logistical difficulty of obtaining trademarks in the country and because of the legacy on which we have built our work. Nor can we constantly monitor our representatives in the provinces. We therefore choose trustworthy people carefully to represent us.

4

Legal and compliance risk

The risk that someone takes legal action against us, or that our representative is negligent in fulfilling our legal obligations towards the government. CERC addresses these risks as follows:

- maintaining adequate organisational insurance policies;
- carefully reviewing all partnership and donor agreements and contracts before signing them;
- having a competent lawyer on our Board and consulting their firm on any legal question that arises;
- drawing up a calendar of legal and financial compliance deadlines throughout the year and adding reminders to our organisational calendar.

Accepted legal and compliance risk

There is a limit to the level of general liability insurance we can afford, and we are always looking for affordable advice on all aspects of national compliance requirements.

5

Community risk

The risk of creating vulnerability or harm within the community we seek to serve. CERC addresses these risks as follows:

- analysing any particular risk related to data collection and considering whether it is necessary to achieve the desired result;

Main risk areas and guidelines (continued)

- anonymising individuals' data wherever possible, to prevent individuals from being targeted or exploited;
- asking all staff to sign a code of conduct, and briefing all staff, interns and volunteers working in the field on how to represent CERC appropriately and interact with community members;
- carrying out surveys and round tables in the field to assess the real value and impact of CERC's work from the community's point of view, and ways of serving it better.
- checking or requesting that grant proposals allow the scope of work to be adjusted if the exchange rate changes radically;
- working continuously to diversify funders and to secure long-term funding partnerships;
- when budgeting, calculating the percentage likelihood of receiving a grant and planning accordingly;
- having an annual audit carried out and requiring each of the local offices to do the same;
- keeping costs as low as possible;
- maintaining accounting policies and procedures and having the Board review the finances every quarter.

Accepted community risk

We may not be aware of new risks to the community as soon as they arise, or may not have the capacity to resolve them immediately. We are committed to talking continuously with communities about the risks they face in connection with our work.

6

Financial risk

The risk that we do not have enough funds to carry out our work if recurring donors withdraw their support, if exchange rates fluctuate sharply or if partners in the field do not properly supervise the use of funds. CERC addresses these risks as follows:

Accepted financial risk

However many controls are in place, there is always a risk of mismanagement of funds. That is why we assess the level of personal integrity of prospective employees very carefully and maintain a culture of accountability within our organisation.

We are also open to scaling back our work if funding constraints so require.



CENTRE DE RECHERCHE SUR L'ANTI-CORRUPTION

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CERC holds Special Consultative Status with the United Nations Economic and Social Council (ECOSOC).