



Ethics and Compliance Unit (ECU)

FY 2021 Annual Report

January 2022 | International Rescue Committee

Ethics and Compliance Unit (ECU): An Overview

IRC's Ethics and Compliance Unit was created in 2016 to ensure that the International Rescue Committee, Inc. and its affiliates, maintain, promote and implement an ethics and compliance program as a priority in the Organization, focusing on the effective prevention, detection, investigation and deterrence of potential violations of IRC's Code, the law or regulations, material failures to meet obligations under contracts, grants, or agreements and IRC's standards of ethical conduct. The program advances IRC's ability to service the needs of its clients and to meet the requirements of our donors as trusted stewards of their resources.

To do this, the ECU works collaboratively and globally with Crisis Response, Recovery, and Development (CRRD), Resettlement, Asylum and Integration (RAI), organizational units and headquarters (HQ) to promote a culture of integrity and compliance.

ECU responsibilities:

- **Culture of Integrity:** ensure that IRC integrates a culture of ethics, integrity, and compliance into its business practices at all levels of the organization, in accordance with the IRC's Code of Conduct ("The IRC Way"), our values, policies, national laws and regulations
- **Promote IRC's Code of Conduct** and annual training
- **Training and Communications:** Develop and implement training and communications programs to raise awareness and prevent potential misconduct
- **Provide Advice** on ethics and compliance issues
- **Risk Identification and Mitigation** through implementation of a global Enterprise Risk Management Process (ERM)
- **Fraud and Corruption Prevention**
- **Due Diligence:** Assure that IRC has appropriate mechanisms in place for staff and third-party due diligence
- **Management of IRC's Hotline and Conduct of Internal Investigations** of potential violations of IRC's Code of Conduct and policies, laws or regulations and material failures to meet obligations under agreements
- **Remediation:** Ensure appropriate remediation is undertaken and control gaps corrected when identified through investigations or other means

The ECU Charter can be found [here](#).

In a year that continued to be challenged by the restrictions of COVID-19, the IRC's Ethics and Compliance Unit (ECU), working collaboratively with key IRC stakeholders, moved forward in several key areas, while managing a record number of new matters reported into the ECU:

- Developed and deployed IRC's first global online Code of Conduct training
- Completed pilot of IRC's Enterprise Risk Management process and initiated implementation by CRRD and RAI
- Conducted virtual Fraud Awareness and Prevention sessions for over 1,000 members of CRRD management teams
- In partnership with IRC's Awards Management Unit (AMU), developed a three-hour interactive virtual training using scenario-based discussions facilitated by trainers

- Managed the highest levels of reporting since ECU was formed. The number of new matters¹ reported into ECU Investigation Team in *FY21* was **21% higher than *FY20***, with 907 new matters received. Not all matters resulted in an investigation by ECU.

Towards the end of 2021, the team was able to add to its roster the positions of Learning and Communications Officer and Project Manager. These positions are already enhancing our ability to more effectively engage and communicate with IRC colleagues on key issues, and to implement global projects and trainings more efficiently.

The ECU is headed by IRC’s Chief Ethics and Compliance Officer (CECO), who reports directly to the IRC General Counsel and the Audit Committee of the Board of Directors. The ECU Org Chart can be found [here](#).

The IRC Way: Who We Are and How We Operate

At the heart of [The IRC Way: Standards for Professional Conduct](#) (available in 17 languages) are IRC’s values of Integrity, Equality, Accountability, and Service.



Integrity



Equality



Accountability



Service

Our Code addresses how we honor our commitments to those who are impacted by our work: our clients, colleagues, donors, suppliers, and partners - and provides practical advice and scenarios to help employees make good decisions. Staff are required to certify their understanding of and intention to comply with the Code each year. Included throughout the Code is information on how to report suspected misconduct.

Annual IRC Way training continues to be a celebrated and important annual event for the IRC - an opportunity for us to refresh and renew our understanding and commitment.

Due to the restrictions imposed by COVID-19 and the many demands on staff and resources in 2020, IRC was unable to conduct its annual mandatory in person IRC Way training. Since crisis can provide opportunity, in 2021 the IRC re-imagined its annual “IRC Way Day” training as ***IRC Way, Every Day***, highlighting the importance of following our Code, Values, Principles, and Standards ***every day***. Due to the need for social distancing, rather than coming together in person we took a blended approach towards our Code training that included:

¹ Matters include all reports, inquiries and allegations of misconduct received by ECU. Not all matters received result in an ECU investigation.

- **An online eLearning course (via Rescue Academy on Kaya):** a first time 90-minute online Code training with seven modules in English, Spanish, French, and Arabic. For staff unable to take the eLearning module, in-person content was created for facilitated live sessions. Focus topics for 2021 included: Safeguarding, Fraud Prevention, Diversity Equality and Inclusion, Human Trafficking, and Reporting Misconduct.
- **Toolkits on focus topics** containing materials and scenarios adaptable to local context, for use by local leadership at staff meetings for additional discussion on IRC Way topics.
- **A series of easy to read one-page information sheets** on IRC Way topics distributed to staff and translated into all IRC languages.

We continued our tradition of engaging **IRC Way Ambassadors**, our Code of Conduct Champions who serve as local focal points, to work with senior management, HR, and a cross-functional team at their location to support staff participation and engagement for the training. This year **386 Ambassadors from across the globe** dedicated their time and enthusiasm to support colleagues.

Training was conducted between September and December of 2021 with all staff required to certify their understanding of and intention to comply with the Code. One colleague offered this feedback after completing the training:

“I really consider it [the course] to be an excellent strategy to connect our staff with IRC’s philosophy. I found it great that it is so interactive, clear, and precise, because it motivates us to read, to continue and to learn. I loved the idea of the puzzle pieces; it is an excellent incentive and highlights the idea that united we are ONE.”



The IRC Way, Every Day 2021 eLearning Course (above) features a puzzle piece motif, depicting how all IRC Staff are connected and part of “One IRC.”

IRC Implements Enterprise Risk Management (ERM)

ERM is a vital support mechanism as we drive towards our Mission and the successful implementation of Strategy 100.

Enterprise Risk Management (ERM) represents a significant and necessary cultural transition for the IRC, as the Organization adopts a consistent approach to risk management and provides a process to identify and manage challenges and opportunities faced in pursuit of our objectives. ERM acts as a key driver of improved performance across the Organization by identifying operational areas in need of additional support and optimizing resource allocation. The process is being embedded into existing

management activities of the IRC at all levels. When fully implemented, it will reduce workload by eliminating redundant, incompatible, and siloed risk management practices while providing an Organization-wide method to gather risk intelligence and deliver valuable insights into management decision-making.

In 2021, the integration of the ERM process continued under the leadership of the Senior Director of ERM in collaboration with IRC's programmatic and operational leadership teams. Following the successful completion of two ERM pilots by Q1 2021 and a thorough feedback and review process, full implementation began at the regional and department levels for RAI and CRRD in March 2021.

It is anticipated that by the end of Q2 2022, ERM will be fully implemented into both programmatic areas (RAI and CRRD) of the IRC. This will include the regional level of operations and programming in the United States and Europe (RAI), and the six international regions of Asia, East Africa, West Africa, Great Lakes, Latin America, and the Middle East (CRRD).

Leadership from each Department are aligning their respective teams, down to the regional level, around objectives and priority areas of focus. Regional Management are actively using risk report cards as an integral part of their management team meetings to effectively assess, manage and triage risk in relation to their objectives with appropriate escalation of issues for decision making and support. While this process is still in its early stages, participants are already seeing positive results from ERM, with some risks being brought before the Risk and Compliance Committee for cross-departmental discussion and resolution.

The risk report cards are entered into an online application developed to support ease of data entry, consolidate risk information, and allow for ERM analysis and reporting. This application will be introduced in Q2 2022.

In parallel to our work with RAI and CRRD, we have continued the process of expanding the ERM implementation to functional areas of the Organization in collaboration with leadership. Steady progress has been made to ensure objectives are clearly agreed upon and adequate training is delivered in preparation for risk report cards to be implemented at the department and regional levels by the end of FY22.

Over time, as the Organization gathers enterprise-wide insights through the risk report cards, the IRC will capture a critical mass of risk 'intelligence' to enhance and inform decision making, optimize resource allocation and provide responsive support to clients and staff in pursuit of the IRC's Mission.

IRC's Risk and Compliance Committee continues to meet regularly to oversee the ERM implementation and provide a central forum for Organizational risk to be escalated, discussed, and resolved in a collaborative cross-departmental manner.

More information on ERM can be found [here](#).



Preventing Fraud and Corruption Through Enhanced Awareness

An organization's most effective approach to ensure that its funds are used for their intended purpose (our clients) lies in prevention.

The International Rescue Committee's anti-fraud program focuses on prevention, detection, remediation, and risk management. Currently fraud monitoring is shared by the field and headquarters to ensure the development of global policies and procedures, implementation and monitoring at the field level, and that gaps, enhancements and lessons learned are shared across the organization.

Building on the strategy of integrating fraud and corruption prevention into all levels of the organization, the ECU works collaboratively with IRC's programmatic and functional teams, including Finance, Global Supply Chain (GSC) and Internal Audit (IA) to develop and implement prevention initiatives that are fit for purpose, field driven and integrated, while simple enough to implement. Using this approach, the IRC continues to strengthen its ability to recognize and prevent fraud and corruption in its activities.

Increasing Staff Training and Awareness

Fundamental to a proactive, comprehensive fraud and corruption prevention program is to increase staff awareness on how to identify potential 'red flags' indicating that there may be issues with how business is being conducted. In 2021, ECU's Director of Anti-Fraud worked in collaboration with CRRD and other key IRC stakeholders to develop multiple forums for IRC staff to build on their knowledge of fraud and corruption prevention:

- **Training for CRRD SMT:** With a focus on IRC's CRRD operations in over 40 countries, in-person (virtual) fraud prevention sessions were conducted in every CRRD region (6), with over 1000 senior management team (SMT) members trained in 2021
- **Three-hour interactive, virtual fraud awareness training developed** in partnership with IRC's Awards Management Unit (AMU): scenario-based discussions facilitated by trainers with smaller groups. Pilot sessions to be completed in Q1 2022 with general rollout in Q2 2022
- **Mandatory eLearning Module on Fraud and Corruption Awareness (40 minutes):** roll out in Q3 2022
- **Fraud and Corruption Prevention Toolkit** shared with senior leaders for use during staff meetings for ongoing discussions outside of a formal training session



The 'Preventing Fraud and Corruption at the IRC: An Introduction' eLearning Course (above) teaches learners how to prevent fraud and corruption in a variety of contexts.

Capacity Enhancement in Partnership with Strategic Stakeholders

ECU's fraud prevention team currently works with other aligned units such as Economic Recovery and Development (ERD) and their cash programming services, and the Emergencies and Humanitarian Action Unit (EHAU) by developing a department specific plan for further engagement and roll out to their teams. Throughout the year the Director of Anti-Fraud regularly met with these teams to discuss issues, solutions, and lessons learned – and explored opportunities for further collaborations to enhance IRC's prevention efforts.

Monthly Compliance Coordinator Meetings

In 2021 CRRD had approximately ten (10) Compliance Coordinators working in eight (8) countries and one region, reporting into their Country Directors or the RVP. The role does not exclusively focus on fraud prevention but also includes responsibilities for aspects of donor compliance, risk management, safeguarding, and providing support for ECU investigations.

Monthly sessions were conducted in collaboration with the CRRD Director of Internal Controls for information sharing and capacity building with the goal of creating a community of best practice. As a part of this series, leaders from other IRC departments met with the Coordinators to share their expertise and lessons learned, provide support, and discuss how these learnings may be used in their day-to-day work.

Compliance Working Group

Created in late 2020, IRC's Compliance Working Group operates as an assurance and coordinating mechanism to identify and provide support on compliance issues. It provides a forum for cross-functional sharing, oversight and review of compliance and control standards and issues with the goal of proactively identifying and preventing organizational risk through early detection and remedial action. The Group meets monthly and also regularly updates the Risk Committee on its work to ensure the two groups are aligned and can each provide the appropriate oversight and support for identified risks.

In 2021, the Group defined its agenda and provided cross-functional support and guidance throughout the year in several areas:

- Review of a targeted analysis of donor audit findings and how to effectively socialize the process and share findings more widely within the IRC
- Consideration of specific country issues of systems failures and weaknesses by providing cross-functional support and a forum for discussion and remediation
- Initial discussions on a Fraud Risk Assessment (FRA) process and approach for IRC led by a subset of the Working Group. The FRA will align with the ERM process.

A key takeaway for this first year has been the effectiveness of a cross-functional forum to address and support issues that may implicate numerous areas of the organization. As we move forward, this coordination and support for the strengthening of organizational controls will support IRC expansion and its ambitions for impact and scale in Strategy 100.

Internal Investigations and Remediation

Most new matters² received by ECU were reported by email (65%), with 31% reported via the EthicsPoint hotline webform, and only 4% received via the hotline phone service.

Our Investigation Team supports a critical mission of the ECU: to safeguard our employees, beneficiaries, staff and resources from misconduct and abuse in complex and high-risk operating environments through investigating allegations of fraud, collusion, and corruption in the use of the grant funds, safeguarding, and other alleged misconduct.

To do this, the ECU has a comprehensive and integrated framework for handling allegations of misconduct including fraud, corruption, safeguarding, and other alleged violations of the *IRC Way*, by a dedicated, centralized, and independent investigation division within the ECU. The Senior Director for Investigations supervises eleven (11) experienced investigators; and two case officers and a data analyst who oversee the IRC hotline, case intake process and donor notifications.

The IRC maintains a whistleblower hotline and other mechanisms (Ethics Hotline, ECU Integrity Email, HR, Managers, Technical Advisors) to provide multiple pathways for raising concerns and reporting potential misconduct. In 2016, the IRC centralized the reporting of all potential misconduct into the ECU.

All issues and concerns raised through the ECU are consolidated in the IRC's Ethics Hotline and case management system for review and investigation, as appropriate. As a result, the ECU can analyze, investigate, and remediate issues with an enterprise-wide view of potential control and program gaps and opportunities. Information on how to report is available internally on [IRC's Intranet](#) and also externally on [IRC's public website](#).

Building Investigation Capacity

Due to COVID-19 and the demands on staff and resources to address, the Investigation Team's planned Investigation Training for designated field staff to support the ECU team on lower risk investigations was postponed in 2021 and will resume once circumstances and resources permit. In FY21, ECU reviewed the existing Investigation training and began creating a virtual training consisting of five eLearning modules to be used in conjunction with live virtual sessions conducted over a five-week period via Microsoft Teams or similar mechanisms. It is anticipated that the first pilot investigation training will occur in Q2 FY22, with roll-out across relevant Country Programs and RAI offices to follow.

Safeguarding Focus

Safeguarding matters, which last year were the second largest category of new ECU investigations, is now ECU's largest category with 173 new investigations opened in FY21. This includes both the sexual and economic exploitation of clients and some staff sexual harassment matters, which typically are referred to HR.

Given the uptick of these high-priority matters, the Investigation Team has expanded its capacity, skills, and knowledge in this area. All investigators have received safeguarding investigations training, both in

² Matters include all reports, inquiries and allegations of misconduct received by ECU. Not all matters received result in an ECU investigation.



group settings hosted by CHS Alliance, as well as more bespoke trainings offered by expert consultants and various INGOs, such as InterAction and Action Aid. The designated Investigation Safeguarding Lead for ECU has been actively engaged with various UN Agency and INGO PSEA working groups, including those hosted by the Inter-Agency Standing committee (IASC), to share sector wide practices with ECU investigators and ensure a uniform, consistent, survivor-centered approach.

The ECU continues to strengthen its partnership with IRC's Violence Prevention and Response (VPRU) and Gender Equality (GE) Units to ensure that their technical expertise is considered and incorporated into ECU's approach to safeguarding investigations, particularly as it relates to IRC's [Survivor-Centered Approach](#).

In FY21, the ECU Investigation Safeguarding Lead drafted safeguarding investigation guidelines for ECU Investigations to ensure IRC follows best practice standards for the triage and review of safeguarding cases. ECU worked with IRC's Safeguarding Unit to develop a support services Risk Assessment Tool for safeguarding matters for use by IRC's County Programs (CPs) and RAI. ECU has begun cascading this tool to relevant Country Programs (CPs) and RAI offices on a case-by-case basis, with a wider, coordinated roll out of the tool, in conjunction with the Safeguarding Unit, expected in FY22.

Investigation Statistics for 2021

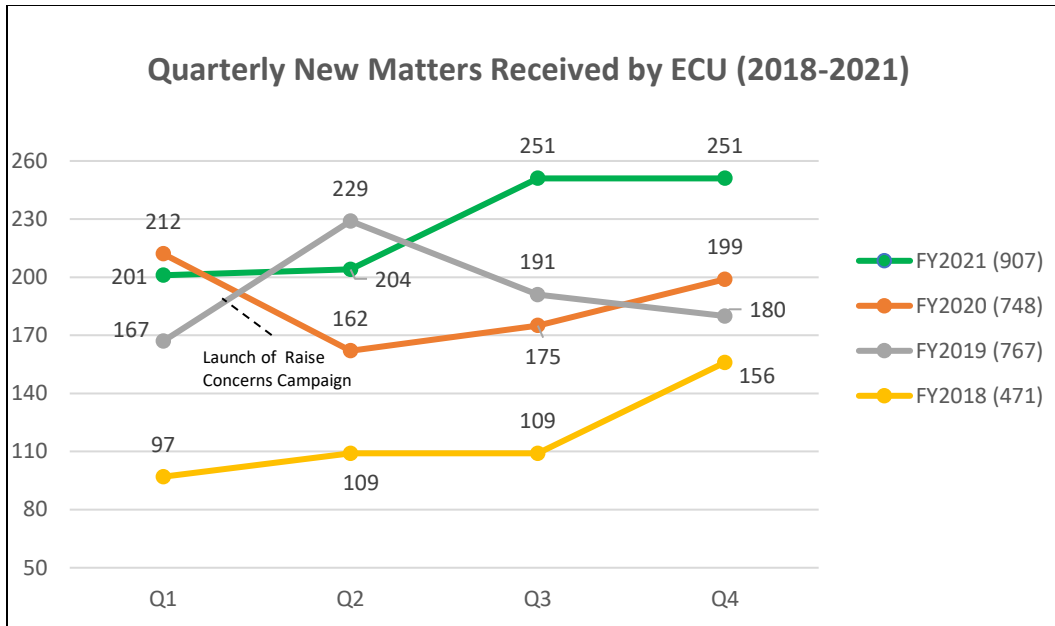
The ECU saw a substantial increase in reporting in 2021:

Number of new matters received in FY21 was **21% higher than FY20**, at 907 new matters. ECU saw a **176% increase in new matters reported since 2017**, the year that annual figures for matters received were first collated. IRC encourages reporting.

FY21 continued to be a challenging year for investigations due to the substantial increase in reported new matters, coupled with the ongoing continued impact of Covid-19 on investigation resources and undertaking investigations remotely.

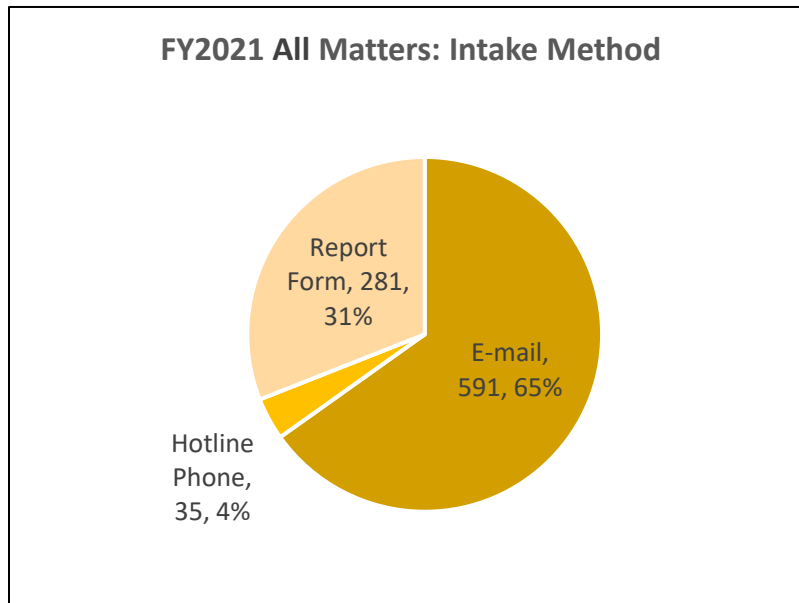
New Matters Received by ECU in 2021

ECU is responsible for maintaining a centralized case management system that includes all new matters reported to ECU directly and through the IRC Ethics Hotline/EthicsPoint, the Integrity mailbox, and any other means. All matters are reviewed and researched by the Case Intake team. For the 907 new matters reported to ECU in FY21, not all resulted in an investigation. Some matters received were inquiries, did not allege misconduct, or raised issues more appropriately reviewed and considered by Human Resources or another organizational Unit.



In Q3 and Q4 of 2021 ending September 30, 2020, ECU received 251 new matters each quarter, the highest number of new matters received per quarter since ECU was formed in 2016.

The majority of new matters received by ECU were reported by email (65%), with 31% reported via the EthicsPoint hotline webform, and only 4% received via the hotline phone service.



ECU holds a weekly case intake meeting to review all new matters reported, chaired by the Senior Director of Investigations. Following that review, the Senior Director of Investigations has a triage meeting with the Chief Human Resources Officer, and Director Global Employee Relations to discuss new matters that relate to Employee Relations. Any Employee Relations matters reported, which rest outside ECU's



remit to investigate, are referred to Global Human Resources. Case Intake and HR triage meetings continued throughout the Covid-19 pandemic.

The 907 new matters received by ECU were triaged and assigned to ECU or HR for further review and action based upon the issues raised:

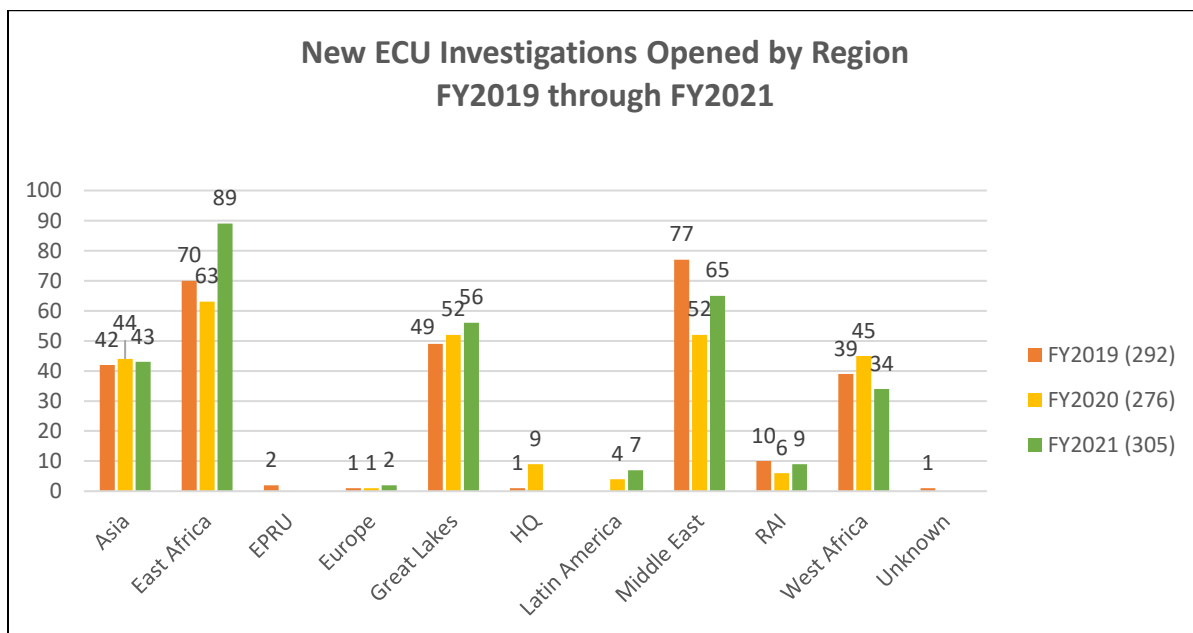
- **Assignment of new matters to ECU and HR in FY21:**
 - **ECU** (487 of new matters – 54%)
 - **HR** (420 of new matters – 46%).

Of the 487 new matters handled by ECU: 305 (63%) resulted in the initiation of a new ECU investigation in FY21.

For further details on the intake, triage, and investigation process, review the [ECU Investigation Guidelines \(2020\)](#).

Breakdown of New ECU Investigations by Region

The regional breakdown of the 305 new investigations ECU opened in FY21 is depicted below. One should not infer that a higher number of investigations indicates that there are more problems in a certain region. Instead, the number of investigations may indicate: higher concentration of staff and programming; healthy reporting environment; or the presence of Country Program Compliance Coordinators that actively work with teams on compliance issues and support ECU investigations.



The regional breakdown of new ECU investigations opened over the past three years has been consistent, with the East Africa region having the highest number of investigations. The regions of Great Lakes, East Africa, and West Africa continue to have the largest number of investigations representing 59% of new investigations opened in FY21, a slight increase from 58% in FY20. This is not surprising considering that the majority of IRC programming occurs in these regions.

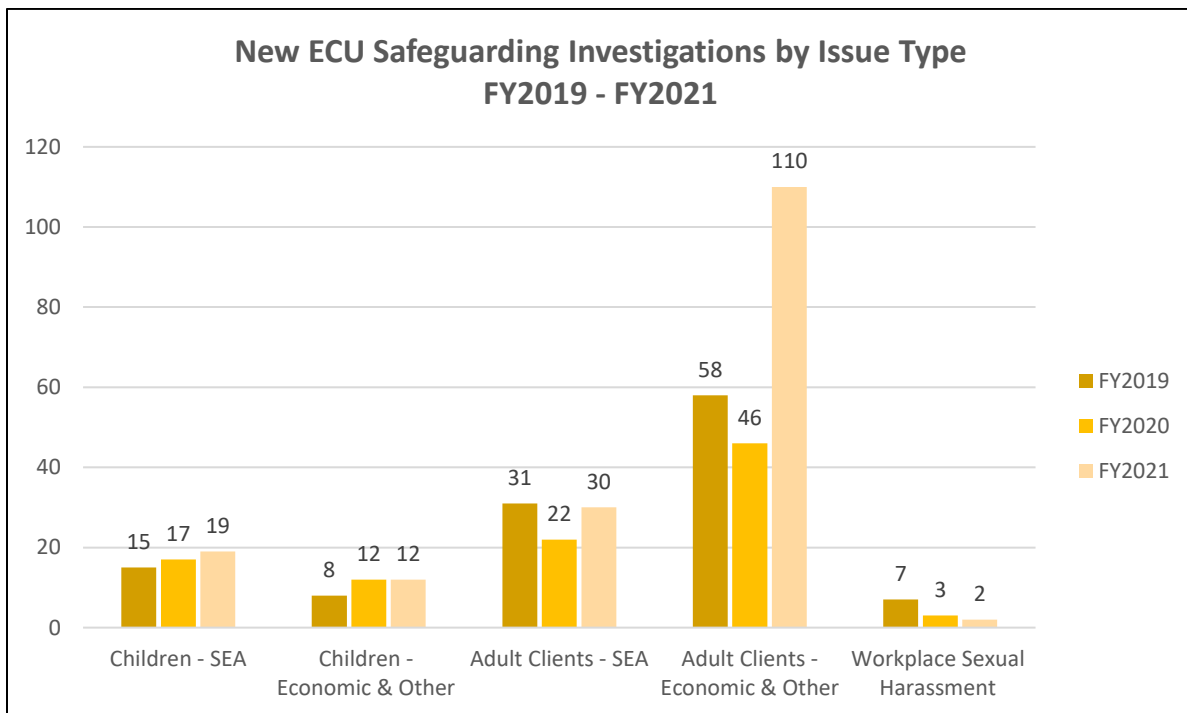
Breakdown of New ECU Investigations by Case Type

For the first time since ECU was formed in 2016, safeguarding investigations represented the majority of all new ECU investigations opened in 2021:

- **Safeguarding** (SEA and Economic): 57% (173) opened compared with 36% (100 investigations) opened in FY20.
- **Fiscal Integrity**: 38% (117) opened, a drop from 55% (155) in FY20.

Safeguarding Investigations

ECU opened 173 new safeguarding investigations in FY21 covering sexual and economic exploitation of clients, and some staff sexual harassment matters which remained with ECU. The majority of staff sexual harassment allegations are investigated by Global HR.



For new safeguarding investigations:

- There was a significant increase in adult economic exploitation investigations. This may be due to increased programming in FY21 as compared to 2020, which disrupted programming in many country programs due to the impact of Covid-19.
- Great Lakes, East Africa and Middle East regions had the highest number of new safeguarding investigations, consistent with reporting in FY19 and FY20.
- West Africa and Latin America regions continued to have low reporting; however Latin America is a newly expanding region for IRC and reporting is likely to increase over FY22.
- A number of Country Programs did not report any safeguarding matters in FY20.

Fiscal Integrity Investigations³

The second largest category for new investigations opened in FY21 was Fiscal Integrity, representing 38%. This is a significant decrease from 55% in FY20. Overall, the number of new Fiscal Integrity investigations opened dropped from 155 in FY20 to 119 in FY21. The category of misappropriation/misuse of IRC assets accounted for 55% of all new Fiscal Integrity investigations. Procurement fraud represented 42%, with 50 new investigations opened.

Case Closures and Outcomes

ECU closed 208 investigations in FY21, resulting in a final caseload of 318 open investigations at the end of FY21. Included in the overall investigations closed are investigations that may have been opened in a prior year that continued into 2021. Despite the significant increase in new matters being reported and its attendant workload, and the continued challenges of conducting investigations with COVID limitations, ECU improved upon its case closure times in FY21:

- 38% of ECU investigations were closed in less than 90 days, compared to 33% in FY20.
- 54% of all ECU investigations were completed in less than 180 days, compared to 48% in FY20.

ECU Cases Open at end of FY2020	ECU Cases Opened FY2021	ECU Cases Closed FY2021	ECU Cases Open end of FY2021
230	305	208	318 ⁴

For ECU investigations closed in FY21, 109 (52%) were investigations regarding safeguarding misconduct:

- In 36% of the safeguarding investigations, the allegations were substantiated, as compared to 30% for Fiscal Integrity investigations.

This underlines that the impression safeguarding investigations have lower substantiation rates than Fiscal Integrity is unfounded.

In its final investigation reports, ECU makes recommendations, as appropriate, to the relevant CRRD/RAI/HQ senior management that may address: risk mitigation measures, recovery of losses, disciplinary action for consideration, potential referrals to national authorities where criminal conduct has been identified, and potential changes to policies, procedures and operational control weaknesses. The relevant CRRD/RAI/HQ senior management make the final decisions on these recommendations for disciplinary and risk mitigation actions to be taken as a result of the Report findings, consulting with ECU as necessary.

ECU works with Global Finance to confirm any assessed losses at the end of an investigation and before the final investigation report is shared with the relevant donor. Global Finance then works with the relevant Country Program to ensure that any losses are not charged to the donor.

³ Fiscal Integrity includes: bribery of government officials, procurement fraud/commercial bribery, misappropriation/misuse of assets, auditing/accounting misconduct.

⁴ 13 cases were reassigned and therefore are not represented in the final ECU cases open at end of FY2020.

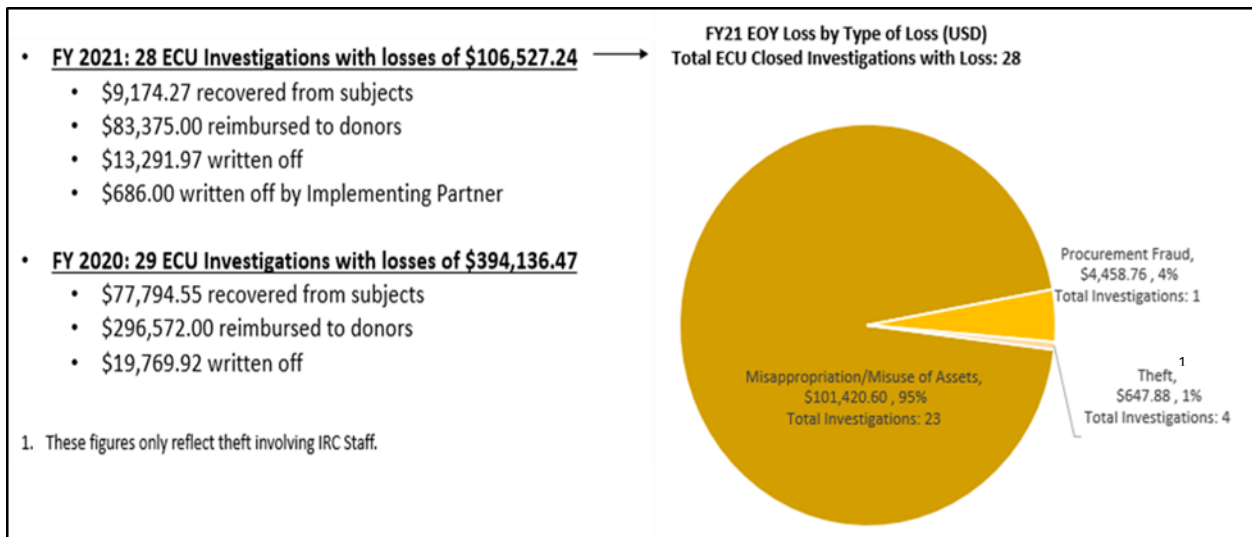


Financial Losses for FY21

Out of the 208 closed investigations in FY21, 28 investigations resulted in financial loss to the IRC totaling \$106,527.24:

- Largest loss for a single case was \$80,784.00
- Remaining loss of just under \$26,000 resulting from 27 investigations

The main category of investigations involving a loss was misappropriation of assets, at 95% of the overall loss. There was one procurement fraud investigation resulting in a loss. The overall loss does not include thefts that were not reported into the ECU but may have been separately handled by security or Country Programs as the allegations did not involve IRC staff or partners. For the closed ECU investigations, 9% of losses were recovered from subjects with IRC covering the remaining losses with unrestricted funds. As a result, there were no donor losses.



Disciplinary Actions

Fiscal Integrity

For 23 substantiated ECU Fiscal Integrity cases in FY20, there was disciplinary action taken against 31 staff including verbal and written warnings and contract terminations.

Safeguarding

FY21 Substantiated ECU and HR Safeguarding Cases – Disciplinary Actions

Issue Type	Number of substantiated cases	Number of staff receiving disciplinary action
Beneficiary Exploitation Sexual	20	29
Beneficiary Exploitation Economic	20	29
Workplace Sexual Harassment	21	29
Total	61	87

Looking Ahead to 2022

In collaboration with our programmatic and functional colleagues globally we will continue our work to ensure that the IRC operates with integrity in all that we do for the benefit of our clients, staff, donors and other stakeholders. ECU's goals for FY22 include:

1. Delivery of Code of Conduct (IRC Way) training sessions across the Organization.
2. Increase effectiveness of Fraud and Corruption Prevention by building knowledge and capacity of staff to identify and mitigate fraud, bribery, and corruption risk through the deployment of a mandatory introductory online course and more advanced in-person sessions, with the development of other materials and communications to support.
3. Working in partnership with CRRD, RAI and Operational Senior Leadership, continue to implement Enterprise Risk Management at the regional level with the goal of ensuring that regional risk information is updated quarterly across the organization by year end 2022. Drive risk analysis and intelligence at the organizational level to report on enterprise exposure and enhance management decision-making.
4. Integrate and localize ethics and compliance activities at the country level to include building the IRC Compliance Coordinator function and strengthening the integration of anti-fraud efforts.
5. Strengthen the ECU's capacity to investigate and resolve cases: enhancement of the ECU Investigation and Case Intake process; provide support for Country Programs, RAI Offices and HR by strengthening investigation capacity across the IRC; and increase staff awareness of the ECU investigation process.