

EcoVisio Integrity Policy (Anti-Corruption)

“Real integrity is doing the right thing, knowing that nobody’s going to know whether you did it or not.”

– Oprah Winfrey

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1. Purpose

Corruption poses a serious threat to fair and equitable development, and exacerbates poverty. Fighting corruption in society and in development cooperation is essential if we are to be successful in our efforts to help bring about sustainable poverty-reduction. It is for this reason that **EcoVisio** has produced this anti-corruption policy.

EcoVisio operations are largely financed by Sida. Consequently, **EcoVisio** has undertaken to apply Sida's anti-corruption rules in its operations. This document describes the organisation's basic view of corruption. Relevant parts of "Sida's Anticorruption Regulation" are therefore used in this policy without particular reference to the document. In its pro-positive approach EcoVisio frames a classical Anti-corruption policy into an Integrity and Justice policy.

This policy is intended directly for all EcoVisio members, staff and the board. It is also relevant for partners of EcoVisio, as a deepening of the brief Cooperation principles and procedures.

2. Guiding Principles

EcoVisio is committed to conducting its activities fairly, honorably, with integrity and in compliance with all state laws and its own system of values. EcoVisio is committed to never accept corruption, to always act on it and to ensure that all employees and members understand their individual responsibilities for compliance. EcoVisio anti-corruption policy is applicable to all its operations and is to be applied by all employees and members. Thus EcoVisio is working to:

- Create a moral context, where corruption, opportunism, dishonesty and injustice are not accepted.
- Promote awareness of the topics and constantly improve the existing institutional framework
- Enforce the penalties for corruption, institute incentives for honesty and just behaviour
- Make sure that all decision making processes underly accountability. Make sure that power is restricted and not viewed as a means of oppression.
- Make resource allocation adequate and fair
- Provide necessary information in a timely manner to relevant people and create transparent processes
- Promote a culture of collaboration in the team
- Establish an atmosphere of warmth and appreciation

3. Definition of main terms

What is integrity?

Integrity involves acting in accordance with values, when thoughts, words and actions are aligned. Its related to honesty which is absence of lying, misrepresenting facts, cheating or theft. It is an overall capacity to understand, value, and uphold truth and morality. It is the basis for all other aspects of character or working culture.

Integrity means acting with and building of characteristics that justify trustworthiness and generate trust among stakeholders. Organizations with high level of integrity create conditions to act with integrity, build integrity with others and intelligently combat corruption. So, integrity is not only good or ethical behaviour.

EvoVisio focuses on integrity in the broader sense and defines it as the alignment of the following key elements:

Accountability = this means opening to stakeholders and giving them possibilities to check that we do what we say we do, by providing mechanisms for this, and being responsive to legitimate internal and external claims. This also includes defining accountability chain i.e. who is accountable for what and to whom; transparent, coordinated and inclusive decision-making based on clear criteria for taking decisions. Transparency is vital part of accountability and includes how the information is provided to internal and external stakeholders about what we do, our results, finances etc. (this includes making information understandable and easy to access). Finally, accountability failure needs to be defined: what happens if one does not act in line with accountability standards e.g. fails to deliver results, is not transparent, violates the law, manager acting with unsupported discretion etc. Accountability needs to be defined at both personal and organizational level.

Competence = this means to do well what we do i.e. having sufficient competencies, skills, experiences, knowledge etc. for the tasks so as to achieve what the organization wants to achieve. This includes being an organization that continuously strives for learning and professional competence development and provides its employees and beneficiaries with opportunities and resources for that. Internal knowledge management is also important for strengthening competence.

Ethics: this means behaving in compliance with values, principles and commitments that are agreed on and established to guide decision-making and behaviour for public good– shared understanding what is legally, morally and professionally important to do, what must be done and what is allowed to be done. Ethical infrastructure of an organization includes having internal mechanisms to define ethical behaviour, but also mechanisms to apply them in day-to-day practice through continuous efforts of ethical socialisation of the staff and beneficiaries, including recognizing and handling ethical dilemmas and ensuring the use of mechanisms through which we listen to stakeholders. Organisations with high ethical behaviour are trusted.

Corruption control: this means having zero tolerance to all types of corruption including material but also non-material aspects of corruption. This also includes establishing functional mechanisms that detect, combat and prevent corruption, having mechanisms do quickly and effectively deal with corruption when/if it happens as well as collaborating with other actors who combat corruption.

Corruption is a form of power- and opportunity abuse for personal gain. Corruption, in **EcoVisio** understanding of the term, is an expression of negative side of opportunism - a conscious act of taking advantage of circumstances with no regard for principles or consequences for others with the purpose of acquisition of undue or improper gain by someone or something – an organisation, institution, company or individual – through the exploitation of position or misusing and opportunity in own interest. This includes forms of corruption such as bribery, extortion, favouritism, nepotism, cronyism, deception, bias and also embezzlement. Several types of corruption, such as bribery, involve both a recipient and a giver. **EcoVisio** denounces both sides of the transaction, and anti-corruption efforts should aim to reduce the incentives to both accept and offer bribes. EcoVisio is committed to establishing institutional mechanisms and dedicate required resources to detect, fight and prevent all forms of corruption both within the organisation as well as in its operation.

What causes corruption and allows it to happen?

Corruption tends to be particularly common in countries with underdeveloped democratic institutions, including little or ineffective competition for positions of political power
 low and unevenly distributed economic growth underdeveloped and ineffective civil society
 underdeveloped rules and systems for dealing with corruption

A number of interacting factors make corruption possible, regardless of whether we are talking about corruption in an organization or in society.

- **Opportunity** – corruption happens because it is possible to happen, there is an opportunity – it is an economic calculation in which people engage when they know that gain is high, costs are low and probability to get caught and punished low or non-existent.
- **An accepting context** - if there is a culture of expecting or even accepting corruption in a certain region/state/organisation/group
- **Lack of awareness and a general institutional framework** - if there are no agreements or rules regarding corruption and the involved actors are not even aware of the possible risks or about detrimental effect of their actions
- **Lack of incentives, penalties and their enforcement** - if corrupt and opportunist behaviour does not lead to any consequences or integrity and justice are not appreciated
- **High level of unsupported discretion and power without restrictions and accountability** - if decision makers are not limited in exercising their power and there is no other entity by whom these decision makers are to be reviewed
- **Principal-agent problem: Information asymmetry and lack of information and transparency:** corruption is facilitated in the deliberate or non-deliberate absence of relevant knowledge or awareness about the processes taking place and interests involved.
- **Pressure of competition and fear among team members:** in a situation of intense competition or fearful uncertainty it may be that people are anxious to do anything to survive, win, or defend themselves, regardless of the agreed values, rules and norms.
- **Estrangement and Antagonism** - in organisations where people do not feel part of the whole team, don't feel warmly welcome and appreciated, don't feel that their opinion is valuable, there is a tendency to have an impersonal connection to work and a higher risk to not care if own activities damage the whole organisation, team or society.

Consequences of corruption and lack of integrity

Corruption undermines efficiency and is a serious hindrance to development. It is one of the single most important causes of the inequitable distribution of resources in many countries. Corruption has seriously adverse effects for society. Corruption is an obstacle to economic and social development. It hinders the democratization process and renders government and society inefficient. At the same time, underdeveloped democratic institutions and a weak democratic culture provide an environment in which corruption is allowed to flourish. On organisational level corruption undermines trust, wastes resources, and destroys a long term-viability of the organisation.

Political costs of corruption: destroys general trust and undermines democracy and the authority of public institutions

Social costs of corruption: increases instability and contributes to poverty

Economic costs of corruption: distorts motivation and markets and has negative impact on public policies)

4. Implementation and evaluation

The implementation of **EcoVisio** anti-corruption policy is to be coordinated and evaluated by an Integrity Officer appointed for the purpose by the Executive Director. Strategic action plans and evaluations are to be documented in writing and incorporated into the organization's day-to-day operational planning and evaluation work. EcoVisio intends to ensure integrity in procurement, human resources management, financial management, delivery of services etc. This document provides some information on these practices, but more detailed examples are to be found in the respective policies

Responsibilities

It is incumbent upon...

... *every manager* to ensure, within her or his own sphere of responsibility, that **EcoVisio** Integrity and Justice (anti-corruption) policy is made known to the employees and that it is applied to all activities.

... *every employee* to apply **EcoVisio** Integrity and Justice (anti-corruption) policy in her or his work. This involves, for instance: explaining it to partner organizations in the field and program participants; remaining alert to corruption and reporting suspected cases of malpractice at work, acting upon suspected cases of corruption.

...*local partners* to apply these Integrity and Justice (anti-corruption) policy regulations in development work for which they receive a grant/support from **EcoVisio**

Organisational planning and assessment

The risk of corruption must always be taken into account and analysed when drafting work strategies and operational plans. If the risk of corruption can be classified as high, a separate description is to be made of how this risk will be handled by the organization in its operations. When necessary, specific country/regional instructions are to be drawn up for the implementation of the anti-corruption policy.

When a project involves the transfer of funds (e.g. within project support and in programme activities), EcoVisio is to analyse and assess its partner organization's capacity to handle the money in a satisfactory manner.

The risk of corruption must be taken into account when projects are assessed. **EcoVisio** must ensure that planned operations have clearly defined activities, results and goals.

Warning signs

Part of responsibility for compliance with this policy includes being alert to "warning signs." These are facts or combinations of facts that might indicate a potential for corrupt activity to occur.

Examples of "warning signs" include:

- Doing business with a company or NGO with well-known historical corruption problems
- Being advised by a customer representative or government official that you must work through a specific agent in order to obtain wished results
- Invoices or requests for payment that are unusual or outside the normal and well-known vendor authorization, approval or payments processes

- Lack of documentation or vagueness of documentation for particular transactions
- Sloppy bookkeeping and poor financial controls over disbursements
- Lack of cooperation by employees in providing answers related to questionable payments
- Abnormal cash payments
- Pressure exerted for payments to be made urgently or ahead of schedule
- Payments being made through 3rd party country (eg. goods or services supplied to country 'A' but payment is being made, usually to shell company in country 'B')
- Abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions
- Private meetings with public contractors or companies hoping to tender for contracts
- Lavish gifts being received
- Individual never takes time off even if ill, or holidays, or insists on dealing with specific contractors him/herself
- Making unexpected or illogical decisions accepting projects or contracts
- Unusually smooth process of cases where individual does not have the expected level of knowledge or expertise
- Abusing decision process or delegated powers in specific cases
- Agreeing contracts not favourable to the organisation either with terms or time period
- Unexplained preference for certain contractors during tendering period
- Avoidance of independent checks on tendering or contracting processes
- Raising barriers around specific roles or departments which are key in the tendering/contracting process
- Bypassing normal tendering/contractors procedure
- Invoices being agreed in excess of contract without reasonable cause
- Missing documents or records regarding meetings or decisions
- Company procedures or guidelines not being followed
- The payment of, or making funds available for, high value expenses or school fees etc on behalf of others.

In potential corruption situations, there is normally more than one “warning sign.” All members and employees should be alert for such warning signs and report any concerns about potential corrupt activity to the Integrity Officer and their supervisor, the Executive Director of EcoVisio or any member of the board.

Anti-corruption Code of Practice

- The organization denounces all forms of corruption, a stance that is to be reflected in the conduct and actions of all employees and elected representatives.
- Elected representatives and employees must not exploit their position in **EcoVisio** for their own or a third party's gain in their relations with employees, partner organizations or other individuals/groups.
- No representative of the organization may accept gifts from colleagues, partners or other individuals or groups, unless the gift is of insignificant value and an appropriately modest expression of appreciation.
- Bribes must never be offered or accepted.
- No representative of the organization is to take part in activities that lead to personal gain. Board members and employees must not commit the organization, financially or otherwise, unless such action falls within the scope of their decision-making powers of authority.
- Employees are to handle funds and material to which they are entrusted with care, and must be prepared to account for such funds or material at any time.

Action to take if there is suspicion of possible corruption

Every situation is unique and consideration must be taken to circumstances and the prevailing situation before a decision can be taken on what is the best course of action. A basic principle is that the police must be notified, however, this alone rarely resolves the situation that has arisen. **EcoVisio** has consequently set out an action plan that describes step by step the general measures that are to be taken when suspicions of corruption arise.

In case of suspicion of internal corruption in EcoVisio:

1. any member notifies the EcoVisio Integrity Officer

In case of suspicion of external partner corruption:

1. EcoVisio Program Coordinator must inform the management, the financial officer and project contacts in the member organisation concerned in conjunction with each incidence of suspected corruption.
2. EcoVisio Executive Director and Programme Coordinator must inform the partner organisation concerned of the suspicions that have emerged. The organisation shall be given the opportunity to respond to EcoVisio questions and to explain the situation that has arisen.
3. EcoVisio management decides whether the police should be notified and informs the partner organisation that all payments will be stopped until such time as any investigation has been completed.
4. The Executive Director notifies the police.
5. The Executive Director fills in *Special Memo when there is suspicion of financial irregularities* which is used as basic data when EcoVisio management makes a decision on additional measures.
6. EcoVisio management decides on any additional auditing, evaluation, follow-up visit, or other form of investigation.
7. EcoVisio management reports to Sida in accordance with Sida's corruption instructions.
8. It is the responsibility of the Executive Director and Programme Coordinators to carefully document the decisions taken and all measures taken in relation to the processes surrounding the suspicion of corruption.

Particular examples of risks and forms of corruption

- Conflict of interest: a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.
- Favoritism: the practice of giving unfair preferential treatment to one person or group at the expense of another.
 - Nepotism - the practice of granting favours to relatives, especially by giving them jobs or providing material gain.
 - Cronyism the practice of granting favours to friends, especially by giving them jobs or providing material gain without proper regard to their qualifications.

Conflict of interest guidelines

A conflict of interest occurs when an individual's personal interests conflict with their responsibility to act in the best interests of the organisation. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a board member's duty to EcoVisio and another duty that the board member has (for example, to another NGO). A conflict of interest may be actual, potential or perceived and may be financial or non-financial. These situations present the

risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the organisation and must be managed accordingly.

A variety of situations, affiliations and relationships may create potential conflicts of interest. An employee's former employment with a prospective or actual donor, beneficiary, contractor, vendor or supplier, could raise an allegation of an apparent or actual conflict of interest. Therefore, if the former employment relationship is within the last six months, the employee must disclose the relationship and abstain himself/herself from managing the grant or contract. In addition, if the former employment relationship is more than six months ago, but is still recent (within the past 12 months), the employee should disclose the relationship and be sensitive to the appearance of a conflict of interest or other impropriety.

Financial or other relationships (i.e., significant investor, governing board member, trustee, advisor, officer, consultant, or other position of influence) of an employee or their family with a prospective or actual donor, beneficiary, contractor, vendor or supplier could create the appearance of impropriety or interfere with an employee's ability to perform their responsibilities on behalf of and in the best interests of EcoVisio. Such relationships should be disclosed in the employee's Conflict of Interest certification.

Additionally, certain types of relationships between co-workers may create conflicts of interest. Such cases are dealt with in the following sections on Anti-nepotism and Anti-cronysm.

General Steps to deal with conflicts of interest

1. Those with a actual, potential or perceived conflict of interest, whether ethical, legal, financial, or other, should disclose it.
2. The case should be recorded (including the nature and extent of the conflict of interest and any steps taken to address it).
3. If the conflict of interest is actual (not perceived or potential) and impermissible the arrangement / agreement / team constellation must be changed in order to eliminate this conflict
4. Any person involved in any type of conflict of interest should remove themselves from a position of decision-making authority with respect to this matter (e.g. Interested board members are prohibited from voting on any matter in which they are involved in a conflict of interest. Any employee is prohibited from influencing the decision making about contracting him or her as a facilitator for an educational program)

Anti-Nepotism: Family Member Guidelines

These guidelines have as a goal preventing conflict of interest in team constellations with couples and family members. A "family member" is a husband, wife, (step-)father(-in-law), (step-)mother(-in-law), (step-)son(-in-law), (step-)daughter(-in-law), (step-/half-)brother(-in-law), (step-/half-)sister(-in-law), uncle, aunt, first cousin, nephew, niece.

It sometimes occurs in EcoVisio that couples or other family members happen to interact or work together as employees, volunteers or members. **The community character of the organisation encourages people to see work and active involvement in the organisation as a source of joy, personal development and service to a larger society. Thus, at times members want to bring their closest family members in to also join different activities.** Rarely, but still it happens that relatives are employees or board members. This fact has a potential consequence of a conflict of interest, when it comes to decisions about benefits of a relative (e.g. being employed, salary,

bonuses, vacation, increase in decision-making power, etc.)

EcoVisio is aware that such situations should not be ubiquitous, but rather represent rare cases. But in order to not completely prohibit involvement of family members in work of EcoVisio the following provisions are adopted, with the goal to help safeguard integrity and justice and prevent possibilities of corruption.

- An employee or a board member may not appoint, employ, promote, advance, or advocate for appointment in or to a position in EcoVisio, any individual who is a family member / couple of that employee.
- There should be no direct relationship between board members or between a board member and an executive director. On other levels of the organisation family ties / couple relationships are possible, if this relationship will not create an adverse impact on work productivity or performance; will not create a conflict-of-interest; and if it complies with other provisions of this policy and if the respective staff have provided a declaration of impartiality
- If any decision needs to be taken, that in any way regards a family member / couple of the decision taker, the respective decision taker has to abstain from influencing this decision in any way. (E.g. If after a thorough and impartial revision of candidates the board wants to employ an executive director who is a family member of one of the board members, then the board member related to the candidate, has no right to participate in or influence in any manner this decision.
- Employees are required to notify the company's Human Resources Department or the Executive Director of (a) any existing familial / couple relationships; (b) any familial relationships that are created among employees (for example, by the marriage of two employees); and (c) the potential employment by EcoVisio of a family member.
- The Executive Director and the Integrity Officer shall annually review the circumstances of employment of each family member / couple to ensure compliance with these regulations.
- When suspicion of nepotism comes up, it is incumbent upon a Program Coordinator or the Executive Director to cause immediate corrective action to be taken and to ensure that the situation is immediately reported to the Integrity Officer and the Executive Director or to the Integrity Officer and the Board

Anti-Cronyism: Friendship Guidelines

One of strategic areas of EcoVisio work is Networking and Enhancing Cooperation. EcoVisio encourages development of friendship ties among staff members, beneficiaries and in general among stakeholders in the field of sustainable development. This enhances cooperation, efficiency and overall impact, brings joy and warmth to working context... In the same time it bares a risk. At times the boundary between "networking" "cooperation" and "cronyism" might be difficult to delineate. EcoVisio is aware of this challenge and is strongly committed to prevention or stopping of cronyism in any form. If board members, employees, members or beneficiaries are friends from before their time with/in EcoVisio or become friends during their time in EcoVisio, their closer relationship is not to have an adverse effect on the organisation or to lead to any form of favoritism.

Thus in hiring individuals for a job, or contracting individuals or organisations for a service / product provision, friendship ties are not allowed to play a decisive role in the allocation of resources. A friend of any staff or organisational member can only be employed or contracted if all other requirements or qualifications are met to the highest degree according to the selection procedure.

In general EcoVisio encourages a culture of unity in diversity and denounces the notion of “friendship in coalitions”. All staff and members are encouraged to develop a friendly relationship with each other. Closer friendships of two or several individuals in the organisation should not create a sensation of intimate closeness of some people on expense of estrangement from other people. This involves preventing and stopping backbiting or any other form of conscious divisive behaviour.

When suspicion of cronyism comes up, it is incumbent upon a Program Coordinator or the Executive Director to cause immediate corrective action to be taken and to ensure that the situation is immediately reported to the Integrity Officer and the Executive Director or to the Integrity Officer and the Board.

Memo on suspected financial irregularities

When we have reason to suspect financial irregularities in a project, the officer is required to record all events relating to the case in a special memo. A decision on the matter will then be taken on the strength of the evidence thus provided. The memo will also form the basis of the information passed to EcoVisio auditors and board, and is to be kept regularly updated as and when fresh information arises throughout the investigation. A step-by-step account is to be given of the measures taken, of the assessment made and the steps taken or proposed for avoiding similar problems in the future.

Below are some examples of possible information to include in the memo.

Measures

- The number and dates of reminders or other important letters etc. issued
- Meetings, telephone calls
- Decisions on the withholding of payments
- Any repayment demands issued
- A description of the audit, the quality and reliability of the tools used, any additional audit performed
- Contact with local auditors
- A statement of whether EcoVisio has reported the matter to the police or other legal authority in the country concerned
- The reason why the partner organisation cannot repay the money (if this is the case) and the reason for our decision
- The requirements that must be met before any future payments can be disbursed
- A detailed list of the improvements made/to be made by the partner organisation to its administrative/financial procedures.

Outline of Memo

- Description of problem
Describe and date the situation in as much detail as possible, stating the nature of the problem and how it arose.
- Proposal for and reason for decision
State the date and nature of the decisions taken on the matter, as well as the deadline for measures to be taken and who has been assigned responsibility for them.
- Measures
State the measures taken, and whether decisions decided upon have not been taken as ordered.
- Case closure
State here the date on which EcoVisio management proposes that the case be closed.

Whistle-blowing

'Whistleblowing' is when a member or a staff member passes on information about wrongdoing they have witnessed or experienced (usually) at work. This policy protects any member or staff who makes a 'protected disclosure' of information, from being dismissed or penalised because of the disclosure.

For the whistleblowing provisions to apply, the reporting person must reasonably believe that the information he/she is giving is true and he/she is acting in good faith.

The whistleblower can clearly indicate any information that he/she doesn't want to be shared from the outset. The provided information is treated as confidential and won't be disclosed without lawful authority.

There is a possibility to contact the integrity officer anonymously by filling out the Integrity contact form on the EcoVisio web-site. But still it should be noted that the Integrity Officer is more likely to investigate potential wrongdoing correctly, where he/she is confident that the party making the disclosure is in a position to make an informed complaint.

Anti-Corruption Clauses for Contracts

The purpose of this clause is to help preserve trust between parties and prevent corruption in both the negotiation and performance of contracts.

This Anti-corruption Clause is intended to apply to any contract that incorporates it either by reference or in full. While parties to a contract are encouraged to incorporate the Clause into their contract by its full name, it is anticipated that any reference in the contract to the 'Clause' or related variations shall, in the absence of evidence to the contrary, be deemed to be a reference to the Anti-corruption Clause. This clause helps preserve trust between parties and prevents corruption in both the negotiation and performance of contracts.

The general aim of the Clause is to provide parties with a contractual provision that will reassure them about the integrity of their counterparts during the pre-contractual period as well as during the term of the contract and even thereafter.

Anti-corruption clause for employment contracts

No EcoVisio employee shall derive undue private benefits from transactions which he/she conducts under any EcoVisio programme. Private interests of employees in all job-related activities must be subordinated to the official EcoVisio Integrity and Justice Policy and conflicts of interest are to be avoided. By signing this contract, employee agrees to study and implement the EcoVisio Integrity and Justice Policy.

Anti-corruption clause for service provision contracts

No EcoVisio contractor shall derive undue private benefit from transactions which he/she conducts under any EcoVisio programme. Private interests of contractors and service providers must be subordinated to the official EcoVisio Integrity and Justice Policy and conflicts of interest are to be avoided. By signing this contract, the contractor agrees to study and implement the EcoVisio Integrity and Justice Policy.

Anti-corruption clause for partnership contracts

Each part obliges to perform its duties in compliance with maximum diligence, complying with standards of integrity and justice and applicable anti-corruption laws and has instituted and maintained policies and procedures designed to promote and achieve compliance.

5. Sources

Compiled based on and inspired by:

mainly:

SIDA's Anti-corruption policy

EcoVisio team discussions and implicit/explicit working culture elements etc.)

With some elements from:

Council of Non-profits (<https://www.councilofnonprofits.org>)

Serious Fraud Office

Law Insider (lawinsider.com)

Northeast Institute for Quality Community Action (niqca.org)

Bill and Melinda Gates Foundation