



CHILDREN IN FREEDOM
Education For The Citizenry We Want



ANTI BRIBERY AND CORRUPTION POLICY

Manual



Aug 2, 2021

CHILDREN IN FREEDOM (CIF)

&

CIF Schools

CIF P.O.Box 25286-00100, Kenya, Africa,
NY, USA (c) 2016

501 (C)(3)

CIF is a registered International NGO under law, **501 (C)(3)**

P O Box 25286-00100, Nairobi. Call us: 254717302397

info@childreninfreedom.org , info@cifschools.com Website: www.childreninfreedom.org , www.cifschools.com

TABLE OF CONTENTS

ACKNOWLEDGEMENT.....	2
1.0 INTRODUCTION	0
2.0 UNDERSTANDING AND RECOGNISING BRIBERY AND CORRUPTION.....	0
3.0 PENALTIES.....	0
4.0 CHILDREN IN FREEDOM’S POLICY	0
5.0 KEY RISK AREAS.....	1
6.0 EMPLOYEE RESPONSIBILITY AND HOW TO RAISE A CONCERN.....	2
APPENDIX : INDIVIDUAL STATEMENT OF COMMITMENT	2

ACKNOWLEDGEMENT

We take this opportunity to give gratitude to all CIF staff, who have contributed to the development of this Anti bribery and corruption policy. Special appreciations go to the Executive Directors Engr. & Dr. Kanayo and the team at the Kenya Office for their technical inputs and support. Their comments were highly valued.

We also thank those who shared with us information on their Anti bribery and corruption policy and their practical experiences.

We thank you all for your contributions.

Executive Director
Children in Freedom
New York, Nairobi

1.0 INTRODUCTION

Children in Freedom values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the organisation's staff as well as others acting on the organisation's behalf are key to maintaining these standards.

The purpose of this document is to set out the organisation's policy in relation to bribery and corruption. The policy applies strictly to all employees, consultants, contractors and to any other people or bodies associated with the Children in Freedom, within all regions, areas and functions.

2.0 UNDERSTANDING AND RECOGNISING BRIBERY AND CORRUPTION

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

3.0 PENALTIES

Anyone found with any case of bribery shall be taken the authorities to take the necessary action in accordance to the law. A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the organization.

4.0 CHILDREN IN FREEDOM'S POLICY

Children in Freedom will not tolerate bribery or corruption in any form.

The organization prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;

- *in order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality;
- Fast tracking a process which is available to all on the payment of a fee; and/or
- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Management.

The organisation will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5.0 KEY RISK AREAS

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The organisation will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of ‘*quid pro quo*’ are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the firm may be held responsible: can include a range of people i.e. agents and consultants, acting on the organisation’s behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6.0 EMPLOYEE RESPONSIBILITY AND HOW TO RAISE A CONCERN

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the organisation. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

APPENDIX 1 : INDIVIDUAL STATEMENT OF COMMITMENT

"I _____(name), have read and understood the standards and guidelines outlined in this Anti bribery and corruption policy. I agree with the principles contained therein and accept the importance of implementing the Anti-bribery and corruption policy and practices while working with or associated with CIF

Name _____

Job title/position/role _____

Signature _____

Date _____

Sign Executive Director

