**Anti-Bribery Policy, ‘Uzima in our Hands’**

**MISSION STATEMENT**

**Uzima in our Hands is an Isle of Wight Christian charity. We aim to** **support very vulnerable children and their families in rural Western Kenya by providing:**

* Scholarships to school
* Food programs for the most vulnerable
* Training to build small businesses and setting up Savings groups to finance them
* Adult literacy classes with the overarching aim of encouraging financial independence.

**1. Purpose of the policy**

**The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure the Charity is conducted in a socially responsible manner. This policy applies to the charity’s activities both in the United Kingdom and in Kenya.**

**2. Definition of Bribery**

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

**3. Overall approach**

**The Trustees are fully committed to ensuring that the Charity operates both legally and ethically.** Bribery or corruption in any form will not be tolerated. The Charity expects all trustees, volunteers, employees and other stakeholders to conduct their activities in a fair, honest and ethical manner at all times.

**The Charity prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement**:

* to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company;
* by any individual employee, agent, member or other person or body acting on the Trustees’ behalf:
	+ - in order to gain any commercial, contractual or regulatory advantage for the Charity in a way which is unethical;
		- in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

**The Charity recognises that market practice varies between countries, and what is normal and acceptable in one place may not be in another**. This policy is not meant to prohibit the following practices [providing they are customary in that particular location and are proportionate]:

* donations given to the Charity or for the benefit of the Charity;
* normal and appropriate hospitality;
* the giving of a gift on a festival or at another special time;
* use of any recognised fast-track process which is available to all on payment of a fee;
* the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only.

**If at any time there is doubt as to whether a potential act constitutes bribery, the matter should be referred to a Trustee of ‘Uzima in our Hands’.** The prevention, detection and reporting of bribery is the responsibility of each individual working on behalf of the Charity. The Trustees operate a **zero-tolerance** approach to any attempts at bribery by, or of, its employees and associated persons and encourages all such individuals to report any suspected bribery activity to a responsible person within the organisation.

**4. Policy Statements**

4.1. It is policy to conduct all of our business in an honest and ethical manner;

4.2. Trustees take a zero-tolerance approach to bribery and corruption;

4.3. Trustees are committed to acting professionally, fairly and with integrity in all our business dealings and relationships in the United Kingdom and in Kenya;

4.4. Trustees will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate;

4.5. Trustees remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

**5. Scope of Policy**

• **Bribes**: Employees must not engage in any form of bribery, either directly or through any third party. Specifically, employees must not bribe a foreign public official anywhere in the world.

**• Gifts**:

* Occasionally, other third parties may seek to reward staff members with a gift. Whilst the Charity has no desire to stop employees from receiving a **small token of gratitude or appreciation**, it needs to be recognised that there is the potential for abuse.
* In addition, some suppliers or contractors may offer ‘**reward schemes**' which allow you to obtain free gifts or discount vouchers in return for ordering services or products on behalf of the Charity from that supplier or contractor. **The Charity needs to be sure that its suppliers and contractors are competitive and that employees are acting in the best interests of the Charity when using a particular supplier or contractor**.
* The Charity does not believe that it is appropriate for staff members to accept anything of greater value than **small tokens of appreciation from suppliers**, contractors or from any other person or organisation with which the Charity has, or might have, business connections. **This is because it is important to ensure that no employee acts in any way that is inconsistent with the integrity of the Charity by accepting a gift in circumstances where it could influence, or be seen to influence, that employee’s business decisions or actions.**
* For the purposes of this policy, a **‘gift’** is deemed to be any payment or item given on an apparent **ex gratia basis** by any party in connection with their employment by the Charity. **Small gifts that are genuinely given as a token of appreciation are acceptable**, provided always that an employee properly **declares the gift** in line with this policy *(see guidance for reporting facilitation payments below)*and provided the employee does **not subsequently treat the sender of the gift more favourably** than other clients, customers, suppliers or contractors.

• **Facilitation payments and kickbacks**: Facilitation payments are a form of bribery made for the purpose of **expediting or facilitating the performance of a public official for a routine governmental action**. Facilitation payments tend to be demanded by low level officials to obtain a level of service, which one would normally be entitled to. It is strict policy that **facilitation payments must not be paid**. It is recognised, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and **where a facilitation payment is unavoidable**, in which case the following steps must be taken:

* Keep any amount to the **minimum**;
* Create a **written and dated record** concerning the payment;
* **Report** it to the Trustees of ‘Uzima in our Hands’.

**5. Communication**

Our zero-tolerance approach to bribery and corruption is communicated to all those working with ‘Uzima in our Hands’, both in the United Kingdom and in Kenya, through the **dissemination of this policy** both verbally and in its written form.

**6.Specific measures in place to guard against the risk of corruption and bribery**

6.1 The charity keeps written records of wage payments to staff, with photographic evidence, and of payments made to suppliers, etc;

6.2 Each trustee copiesin at least one other trustee when communicating about charity activities, making payments, etc;

6.3. As this is a new venture a local Kenyan bank account has been set up.

6.4 Both the UK accounts and the local Kenyan accounts are audited independently and checked;

6.5 The Charity keeps in close communication with the Team Leader for the Nanderema and Special Needs Project, and as this Project embeds will visit at least once a year, to avoid any misunderstandings and ensure close cooperation between the teams in the two countries.

**Signed**.....Joy Mowle....................**Chair of Trustees (Printed name:........**JOY MOWLE......)

**Date**..........August 2025.................................................................

**Reviewed..............**August 2027**..........................................................**

**Signed**..............................................**Chair of Trustees (Printed name:................................................)**