



Anti-fraud, bribery and corruption policy

January 2026

Policy Summary

SeeKenya has a zero-tolerance policy towards fraud, bribery, and corruption. We are committed to minimizing opportunities for such activities and will take disciplinary and/or legal action against perpetrators.

Purpose

To outline **SeeKenya's** stance on fraud, bribery, and corruption, and our approach to prevention, detection, reporting, and investigation.

Scope

This policy applies to all staff, volunteers, consultants, and contractors. Non-compliance may result in disciplinary action.

Policy Statement

- **Zero Tolerance:** No acceptance of fraud, bribery, or corruption.
- **Disciplinary Action:** Legal and/or disciplinary action against those involved in fraudulent activities.
- **Anti-Fraud Culture:** Commitment to an anti-fraud culture and minimizing risks.

Risk and Internal Control Systems

- **Risk Assessment:** Regular assessment and review of fraud risks are undertaken.
- **Internal Controls:** Efficient systems to prevent and detect fraud exist and are reviewed regularly.
- **Training:** Staff and volunteers will be made aware of fraud risks and responsibilities by sharing this policy on an appropriate basis..

Reporting

- **Internal Reporting:** Immediate reporting of suspected fraud to a Trustee or the Charities Commission.
- **External Reporting:** Compliance with obligations to report fraud to third parties.

Investigation

- **Serious Investigation:** Proportionate and appropriate investigation of all reports.
- **Disciplinary Action:** Disciplinary and/or legal action against those found guilty.

Responsibilities

- **Trustees:** Recording and investigating fraud, providing advice and training.
- **Staff and Volunteers:** Compliance with this policy.

Definitions

- **Fraud:** Misleading representation for personal gain.
- **Bribery:** Offering financial or other advantages to influence actions improperly.
- **Corruption:** Misuse of power for personal gain.
- **Conflict of Interest:** Private interests influencing decisions.

Approval and review

Approved by P Wright	Signed Paul Wright
Policy owner J Stevens	Signed John Stevens
Review date	Jan 26