



**Africa
Educational
Trust**

*Education is the key
to development*

The Africa Educational Trust (AET) Anti-Bribery & Corruption Policy

1 Introduction

It is the policy of AET that all AET trustees, staff, volunteers, and consultants contracted by AET to carry out work on behalf of AET conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

AET trustees and senior management recognise that bribery is a criminal offence in most countries and that corrupt acts expose AET and its employees to the risk of prosecution, fines and imprisonment, as well as endangering AET's reputation in the UK and overseas.

This policy has been adopted by the Senior Management Team (SMT) and the utmost importance is attached to this policy. AET will apply a 'zero tolerance' approach to acts of bribery and corruption by any of our employees or third-party representatives.

Any breach of this policy will be regarded as a serious matter and may result in disciplinary action for employees and/or termination of contracts/agreements with consultants and partner organisations.

2 What is Bribery and Corruption?

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract.

Corruption is the misuse of public office (e.g. through facilitation payments) or power for private gain, or misuse of private power in relation to business outside the realm of government

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.

The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve initiatives such as buying or selling, or it may involve the handling of administrative tasks such as licences, customs, visas or taxes. It does not matter whether the act of bribery is committed before or after the activity has been undertaken.

3 What is a Bribe?

Bribes can take many forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – i.e. both parties will benefit. A bribe could be:

- The direct or indirect promise, offering or authorisation of anything of value in return for a favour
- The offer or receipt of any kickback, loan, fee, reward, gift or other advantage in return for a favour e.g. wining tenders
- The giving of aid, donations or voting with the intention to exert improper influence
- Facilitation payments – money or goods given to a public official to perform or speed up the performance of an existing duty.

Guidance to AET staff

AET requires that all staff act and behave in a way that brings credit to the organisation and with specific respect to the Bribery Act of 2010 that trustees, staff, volunteers and contracted personnel (such as consultants) ensure its provisions are acted upon.

Below are AET management processes for the purpose of assessing and determining the risks of bribery and the steps necessary to mitigate such risks, as follows:

- Monitoring of AET managerial processes for the recording of, authorising of, and managing of all expenditure, payments, personnel expenses and income in the form of donations/sponsorship and other giving to AET
- Active discouragement to the giving and receiving of significant gifts to and from AET personnel
- Part of Senior and Programme Co-ordinator management monitoring visits is to assess risks of bribery and corruption
- A record maintained within AET of incidents of corruption and the action taken
- Any training (including updates) offered by relevant bodies to NGO staff to be considered very seriously by AET
- Protective mechanisms established within the organisation for whistle blowers (to be developed)

When action is necessary

- In the event of concerns arising within AET in the UK
- In the event of concerns arising regarding 3rd parties within the UK
- In the event of local NGO or government partners broaching concerns to AET
- In the event of AET staff discerning issues arising in the course of programme implementation