Integrity Policy

ADOPTED POLICY

The Board of Indigenous Women Leaders of Feiyah Action Network adopted this policy at its emergency meeting on 3 November 2026, and it is in force from that date. It is reviewed every two years, and sooner if the law changes, FAN's programmes change, or a serious incident shows a weakness.

1. Why FAN has this policy

Feiyah Action Network works in a community where people are related to each other. Staff, board members, suppliers and the families FAN serves often share clan, marriage or household ties. That is normal and it is not wrong. What is wrong is making a decision that benefits someone you are connected to without saying so.

This policy covers two things: declaring interests before a decision, and raising a concern when something appears to be going wrong. Both exist so that honest people are protected and dishonest conduct is difficult.

2. Scope

Applies to board and management committee members, all staff, all volunteers, and consultants and contractors when working on FAN business.

3. What counts as an interest

An interest exists where a decision could benefit you, or someone close to you, rather than FAN. It includes:

- A family relationship, by blood or marriage, including in laws and step relations.
- A clan relationship, where that connection would reasonably be expected to influence a decision or be seen to.
- A household member, whether related or not.
- A business you own, work for, or have an interest in.
- A position you hold in another organisation applying for, or receiving, FAN funds.
- A close friendship or a personal relationship.
- A debt owed to or by you.

An interest is not a wrongdoing. Failing to declare it is.

4. Declaring an interest

1. Every board member, staff member and volunteer completes a written declaration on appointment and once a year after that, using the form at Annex A, even where there is nothing to declare.
2. Where a decision arises in which you have an interest, you declare it before the discussion, not after the decision.
3. You then withdraw from the discussion and the decision. The withdrawal is recorded in the minutes or on the procurement file.

4. Declarations are kept in the register at Annex B by the Executive Director. The chairperson keeps the Executive Director's own declaration, so that no one holds their own.
5. The register is reviewed by the board annually, and the board records that it has done so.

5. Related party transactions

FAN may buy from, employ, or grant funds to a person or business connected to a staff or board member, provided every one of the following is true:

- The interest was declared in writing before the process began.
- The connected person took no part in the decision.
- The process was competitive and followed the Procurement Policy.
- The terms are no better than FAN would have obtained elsewhere.
- The board was informed.
- The transaction is recorded in the register and disclosed in the year end accounts.

Concealing a connection, or arranging a process so that a connected party wins, is gross misconduct.

6. Raising a concern

If you believe something is wrong, say so. This section protects you when you do.

6.1 What to raise

- Fraud, theft, bribery or misuse of FAN funds or assets.
- Falsified records, reports, attendance sheets or claims.
- An undeclared conflict of interest.
- Conduct that puts a child or adult at risk, which also follows the Safeguarding and Protection Policy.
- Any attempt to conceal any of the above.

6.2 Who to tell

If the concern is about	Report to
A colleague or a programme	The Executive Director, or Ltumbesian Marleni, Head of Finance
Money, assets, records or claims	Ltumbesian Marleni, Head of Finance, who may be approached directly and without going through the Executive Director first
The Executive Director	The board chairperson, by letter to the FAN office or by email to info@feiyahactionnetwork.org marked for the chairperson
A board member	The chairperson, or the full board excluding that member
The chairperson	Any two other board members jointly
The Head of Finance	The Executive Director, or the board chairperson, so that a concern about finance is never reviewed by the person it concerns
Anything, where you do not want to approach any of the above	Antonella Mbositan, Chief. She holds no position in FAN and is not accountable to it. Her office is close to FAN's office in Laisamis and she may be approached directly.

Two points about the external route. The Chief holds a public office, so a concern taken to her may lead to official action, and FAN does not promise that it will be kept private. That is stated here so that no one is surprised by it. FAN also has no authority over the Chief and cannot direct what she does with a concern, which is the reason the route is worth having.

6.3 How to raise it

- In person, by phone, by SMS, or by letter placed in the complaints box at the FAN office.

- Anonymously if you prefer. An anonymous report is taken seriously, though it may be harder to investigate.
- A concern raised by a community member rather than a staff member follows the complaints route in the Safeguarding and Protection Policy, and is treated the same way.

6.4 What happens next

1. The person receiving it acknowledges within five working days, unless the report is anonymous and gives no means of reply.
2. They decide whether it is a safeguarding matter, a fraud matter, or another kind of concern, and apply the relevant policy.
3. The reporter is told the outcome in general terms within thirty working days, or told why more time is needed.
4. The report and the response are recorded.

6.5 Protection from retaliation

- No one who raises a concern in good faith will be dismissed, disciplined, demoted, excluded from activities, have hours or pay reduced, or be treated badly in any way.
- This protection applies even if the concern turns out to be mistaken.
- Retaliating against someone who raised a concern is itself gross misconduct.
- Where the reporter is a volunteer or community member, protection means they keep their place in FAN's activities.
- Deliberately making a false allegation, knowing it to be false, is a disciplinary matter. An honest concern that proves unfounded is not.

Verify whether any statutory whistleblower protection applies to FAN and its workers under Kenyan law, with a Kenyan advocate, before relying on this section alone.

7. Review

Reviewed every two years, and sooner if a weakness is found or the law changes.

Adoption

Completed by the adopting body. The board adopted this policy at the meeting recorded below.

Field	Entry
Adopted by	The Board of Indigenous Women Leaders of Feiyah Action Network, at its emergency meeting
Date of meeting	3 November 2026
Resolution number	Min Res 6/2026
Date this version takes effect	3 November 2026
Review due	3 November 2028
Policy owner	Executive Director
Supersedes	No previous policy. This is the first integrity policy FAN has adopted.
Date this file was issued	4 November 2026. This file was produced after the meeting, to record the decisions taken at it. The text was not altered in any other way.

Chairperson	Policy owner
Name: Signature: Date:	Name: Signature: Date:

Annex A: Declaration of interests form

To be completed on appointment and annually. Return to the keeper of the register.

Field	Entry
Name	
Role in FAN	
Date	
Do you, or anyone close to you, have any business that has supplied or may supply FAN?	Yes / No. If yes, give details.
Are you related, by blood, marriage, clan or household, to any FAN board member, staff member or volunteer?	Yes / No. If yes, give details.
Do you hold a position in any other organisation that receives, or may seek, FAN funds?	Yes / No. If yes, give details.
Any other interest that could affect, or appear to affect, your judgement in a FAN decision?	Yes / No. If yes, give details.
Declaration	I confirm the above is complete and correct, and I will declare any new interest as soon as it arises.
Signature or thumbprint	
Language this was explained in	

Annex B: Register of interests and decisions

Date	Name and role	Interest declared	Decision affected	Action taken, for example withdrawal

Annex C: Gifts and hospitality register

Date	Who offered it	What was offered and value	Accepted or declined	Approved by

Annex D: Concerns raised register

Kept separately from the safeguarding register. Concerns about children move to the safeguarding register.

Reference and date	Raised how, named or anonymous	Nature of concern	Action taken and by whom	Outcome, date closed, reporter informed