



ANTI-BRIBERY POLICY

Introduction

The Bribery Act 2011 requires organisations to have a clearly stated anti-bribery policy. The Act introduces a new crime of failure to prevent bribery, which means that any organisation unable to demonstrate that they have implemented adequate procedures to prevent corrupt practices within their ranks, or by third parties on their behalf could be exposed to unlimited fines. The Company values its reputation for ethical behaviour, financial probity and reliability. Any involvement in Bribery would reflect adversely on the organisations image and reputation. The purpose of developing this policy is, therefore, not only to ensure that the organisation is compliant with the legislation, but is actively taking steps to protect its good standing and reputation in the communities in which it operates.

Definition of Bribery

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

Unacceptable Behaviour

The following behaviour, on the part of any employee, contractor or volunteer involved with The Company, is unacceptable and must not occur:

- Accepting any financial or other reward from any person in return for providing some favour
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward from any person in return for providing some favour

Business Gifts

From time to time, clients, suppliers or other persons might offer a gift to employees, contractors or volunteers. This could be a small item or something of considerable value. All gifts, however small, must be reported to the person's line manager and recorded. If the gift is offered and then refused because of its value, this must be reported to the person's line manager, who must then record this information in the gifts register.

Hospitality

From time to time, clients, suppliers or other persons might invite an employee or contractor to a hospitality event. All such invitations must be reported to the person's line manager or The Directors. Permission must be given by the appropriate person before any employee or contractor or volunteer accepts any invitation and it must be logged in the gifts register.

Offering Gifts and Hospitality

It is not this organisation's custom to offer gifts to clients, suppliers and other persons, unless there are small items of a promotional nature, or issued to clients following an assessment of need for the item. A record must be kept of all such gifts given to individuals within the case notes made as part of their assessment, unless the items have been distributed at a promotional event and this is not possible. Any employee, contractor or volunteer must not organise any hospitality without seeking permission for this from their Line Manager/The Director.



Responsibilities of Managers

Managers within the organisation are responsible for keeping a record of all gifts and hospitality offered and/or received by employees, contractors, consultants and any volunteers within their area of responsibility. If the manager becomes concerned about any issue, they should contact the Director immediately to raise their concerns and take advice about the appropriate action to take. They are also responsible for ensuring that all their employees, contractors and volunteers are aware of this policy and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Managers must authorise all expense claims from their employees, contractors and volunteers, who support projects that fall within their area of responsibility. Managers are expected to check and sign all expense claims from their employees and volunteers against receipts as appropriate. Any items of expenditure that give rise to concern will be fully investigated.

Also see the Company Expenses Policy.

Attempts to Bribe

Any employee, contractor or volunteer who is concerned that he or she is potentially being bribed, should report this matter to his or her line manager immediately.

Disciplinary Action

Any employee found to have offered or accepted a bribe will face disciplinary action, which could include dismissal for gross misconduct, as per the Disciplinary Policy. Any employee, contractor or volunteer found to have offered or accepted a bribe; will no longer be able to be associated with the organisation. The Director will ensure that all necessary action is taken to resolve any issues, including involvement of the police if required.

Raising Concerns

If an employee, contractor or volunteer is concerned that acts of bribery are occurring in the organisation, they should inform the Director in the first instance. If this course of action is inappropriate, the employee, contractor, consultant or volunteer should inform another senior manager and/or use the Whistle blowing Policy.