

# Policy Anti Corruption and Bribery

<b>Approver</b>	Senior Management Team
<b>Policy</b>	Anti Corruption and Bribery
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Managing director  
Signed by: 216f377d-1dde-489f-ae92-58d0ab87f938

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## 1. Introduction.

### 1.1.

AreYou - Training and Consultancy is committed to carrying out its business fairly, honestly and openly. We believe that we should NOT receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and integrity.

1.2. This policy applies to all persons working for us or on our behalf. This procedure does not form part of any employee's contract of employment. The policy applies to all processes and to any dealings with any customers, clients and suppliers.

1.3. AreYou - Training and Consultancy recognises that any involvement in bribery is both illegal and will adversely impact its image, reputation and have serious business implications. This policy aims to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the company to accusations of unethical or unlawful behaviour, including what an employee should do if they are given a gift.

## 2. Responsibilities

2.1. A Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees,

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hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.

- 2.2. All staff and volunteers have a responsibility to help in the prevention, detection and reporting of bribery. Specifically you must not:
  - Give or offer any payment, gift or other benefit in the expectation that a business advantage will be received in return, or to reward any business received
  - Accept any offer that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else
  - Give or offer any payment to a government or local council official to facilitate or speed up a routine or necessary procedure, contract or tender.
- 2.3. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption. You must not knowingly fail to challenge or report suspicions of bribery or corruption.
- 2.4. When deciding whether to accept or decline a donation or gift we will consider the company's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our aims and objectives.
- 2.5. An employee or any member of their family/friends should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.
- 2.6. Unless you have been informed otherwise you may accept a gift to a nominal value of £15, such as a box of chocolates or biscuits when it is customarily offered to others having a similar relationship with that individual or organisation. It must be made clear to the person or organisation that is giving the gift that the gift will be brought back to the AreYou - Training and Consultancy office where a decision will be made as to how to use the gift.
- 2.7. AreYou - Training and Consultancy will not take gifts from organisations or individuals who participate in activities which go against our company values.
- 2.8. If supporters wish to make a donation to a specific area of AreYou - Training and Consultancy's work then they make a specified donation by providing written instruction to this effect with their donation. AreYou - Training and Consultancy will always respect this. If AreYou - Training and Consultancy is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way, then AreYou - Training and Consultancy will refund the donation.
- 2.9. The Managing Director, Jennifer Hudson, will have the final word in what is an acceptable or unacceptable gift.
- 2.10. All gifts must be declared to the management team who will record these and decide on the appropriate course of action. Any donations can only be received by the management team and anyone who would like to donate to us should be given their contact details.

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- 2.11. Staff and volunteers or any member of their family/friends should not, directly or through others, offer or give any, money, gifts or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's or individuals relationship with us.
- 2.12. Staff and volunteers must not give gifts or anything similar to clients as this could be misconstrued. If staff wish to organise small gifts (for example at Christmas) this must have prior approval of the manager and be clearly gifted from AreYou - Training and Consultancy as a whole – not the individual.
- 2.13. If any member of staff or volunteer is concerned about a gift that has been given or offered which may represent a possible breach of these rules they should approach their manager who will treat any such information in confidence or they should report it in accordance with our Whistleblowing Policy as soon as possible.
- 2.14. Staff and volunteers should also consult their manager if they have any questions – however minor - about the interpretation and application of this policy.