



Anti Bribes, Gifts and Hospitality Policy

KEY INFORMATION

Policy prepared, reviewed or amended by:	Bridgette Doyle and Suzanne Hilton – Chief Executive
Policy approved by Board of Trustees on:	24 August 2021
Policy became operational on:	28 July 2015
Next Review Date	The Anti Bribes, Gifts and Hospitality Policy, and associated guidance and procedures does not form part of staff contracts of employment and may be reviewed and updated at any time. It will be reviewed no less than every three years, or sooner where there are significant changes to guidance or legislation. Minor updates will be made as required.

1.0 INTRODUCTION

- 1.1** In running a charity it is vital to operate in an honest and ethical manner at all times to instil confidence in all our stakeholders. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

2.0 POLICY STATEMENT

- 2.1** Age UK Bolton understands the importance of operating honestly and ethically and owes a duty to their stakeholders to make Anti Bribes, Gifts and Hospitality Policy a priority.
- 2.2** For the purpose of this policy, 'client' means anyone who uses the service directly or indirectly, whether this be an individual older person, their representative or carer or another organisation.
- 2.3** This policy should be read in conjunction with other Age UK Bolton policies and procedures including the Conflict of Interest and Whistleblowing policies.

3.0 SCOPE

- 3.1** This policy applies to all permanent and temporary employees, trustees, volunteers, agency staff, job applicants, contractors, consultants who are working for or supplying services to Age UK Bolton or Age UK Bolton Enterprises Limited (*which is a wholly owned subsidiary of Age UK Bolton*) hereafter referred to as "workers".

4.0 WHY THIS POLICY EXISTS

4.1 The purpose of this policy on Anti Bribes, Gifts and Hospitality Policy is:

- To comply with charity law and follow good practice.
- To protect the rights and interests of stakeholders.
- To provide transparency in our operating practices.
- To provide practical guidance and credibility to our organisation and to instil confidence in it.

5.0 BRIBERY

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

5.2 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or in their absence the Chief Executive.

5.3 Specifically, you must not:

5.3.1 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;

5.3.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;

5.3.3 give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

5.4 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.

6.0 GIFTS AND HOSPITALITY

6.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. If in doubt whether hospitality is “reasonable” please discuss first with the Chief Executive and/or the Chair of the Board of Trustees.

- 6.2** A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Any hospitality for the purpose of entertaining clients, volunteers or partners must be cleared with the Chief Executive *in advance*.
- 6.3** Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift; so, for example, a box of chocolates, bunch of flowers or bottle of wine may be acceptable as we can share these for the benefit of all staff, volunteers and clients. However, gifts such as cash or cash equivalent (such as vouchers) would not be acceptable. Gifts should not be given or received in secret and must be given in our name (Age UK Bolton), not your name.
- 6.4** Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

7.0 RECORD KEEPING

- 7.1** You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 7.2** All accounts, invoices and other records relating to dealings with third parties, including suppliers and customers, should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

8.0 HOW TO RAISE A CONCERN

- 8.1** If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or the Chief Executive **OR** report it in accordance with our Whistleblowing Policy as soon as possible.

9.0 POTENTIAL SANCTIONS FOR BREACH OF POLICY

- 9.1** Knowingly breaching this policy is a serious matter and may result in disciplinary procedures being taken. Any employee who breaches this policy will face disciplinary action which could result in dismissal on the grounds of gross misconduct. A 'non-employee' who breaches this policy will be liable to have their contract terminated with immediate effect.

EMPLOYEE/VOLUNTEER CONSENT STATEMENT

I (name of employee/volunteer) hereby confirm that I have read, understood and will comply with the attached Age UK Bolton Anti Bribes, Gifts and Hospitality Policy

Signed.....

Date