Anti-Corruption Bribery and Gifts Policy

Age UK Surrey is committed to maintaining the highest possible ethical standards in all its business activities. The Bribery Act 2010 prohibits offering, giving, seeking promising or accepting any bribe, whether as financial or any other kind of inducement. This Policy applies to all persons working for Age UK Surrey (AUKS) or on its behalf in any capacity including employees at all levels, volunteers, Trustees, contractors, clients and external consultants.
The charity is opposed to any form of bribery. In order to minimise the risk we ask all Staff and Trustees to complete a Declaration of Interest statement on commencement of their time with us and this is reviewed regularly. We have a Conflicts of Interest Policy and procedures which give further guidance on this.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory, monetary, financial or other personal advantage:

- to or from any person or company, whether a public official or public body, or a private person or company, wherever they are situated; or
- by any individual trustee, employee, or other person or body acting on A UKS's behalf;
- in order to gain any commercial, contractual or regulatory advantage for AUKS; or
- in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Bequests

No persons working for AUKS will accept personal gifts of cash, or bequests from clients, including their family, relatives or friends.

Should this situation arise staff must explain that they are doing their job and there is no question of them accepting personal gifts of cash for the services given. If the client is insistent on making a cash gift staff should explain, that under AUKS policy, it can only be accepted as a donation to the Charity.

If a member of staff has prior knowledge of a client's intention to make a personal bequest in their will, then they should attempt to dissuade the client from doing so. Such instances must be recorded on the client's file and should be reported to the staff member's Line Manager.

If a staff member is bequeathed a sum of money or a specific gift from the estate of a client, then the staff member should report it immediately to their Line Manager. If necessary, legal advice will be obtained on their behalf and, where relevant, any records that were previously made of the client being asked not to make a bequest must be provided as mitigating evidence.

Gifts and Hospitality (see also the expenses procedure)

This policy does not prohibit the following practices provided they are proportionate and are properly recorded in the Age UK Surrey Gift Register kept in \\public\Gifts Register or recorded on the appropriate expenses claim form:

- the provision of normal and appropriate hospitality
- the giving and accepting of gifts appropriate in the circumstances eg. flowers, chocolates, wine/spirits or a gift voucher, the payment for specific services, authorised and recorded by AUKS.

Personal gifts of a value in excess of £50 should not be accepted from a client/customer, supplier or potential supplier without express permission from your line manager.

Acceptance of hospitality, such as lunch or drinks receptions, should be kept within common sense limits and should always be authorised by a manager. Offers of hospitality must always be authorised by a manager.

If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your Line Manager or the Chief Executive for guidance before proceeding.

Responsibilities

The prevention, detection and reporting of bribery is the responsibility of all trustees and staff. If and when an instance of bribery is identified, remedial steps must be taken immediately, including the reporting of the incident (or suspected incident) of bribery in accordance with AUKS's Whistleblowing Policy.

Review

This policy will be reviewed every three years. (*Note Issue 3 of this Policy had the addition of the words from Gifts and Donation Policy which is now obsolete.)*

Issue	Date agreed by Board of Age UK Surrey	Reviewed
1	17th July 2014	July 2017
2	29th November 2017	Sept 2020
3	27th January 2021	Mar 2024
4	April 2024	