



Gifts and Hospitality, Anti Corruption and Bribery Policy

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1. Introduction

- 1.1 Age UK Sutton (AUKS) 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, including trustees, employees at all levels whether permanent or temporary, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (collectively referred to as Age UK Sutton colleagues) . This procedure does not form part of any employee's contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case. The policy applies to all processes and to any dealings with any customers, clients, partners and suppliers.

2. Aim

- 2.1 AUKS values its reputation for ethical behaviour and financial probity and reliability. AUKS recognises that any involvement in bribery is both illegal and will adversely impact its image and reputation.
- 2.2 The aim of this policy is to help employees understand what to do if they are offered gifts and hospitality, and to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

3. Bribery

- 3.1 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, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 3.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 3.3 All staff, volunteers and other parties as set out in section 1.2 above have a responsibility to help in the prevention, detection and reporting of bribery. Specifically you must not:
 - 3.3.1 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

- 3.3.2 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
 - 3.3.3 give or offer any payment (sometimes called a facilitation payment) to a government or local council official in any country to facilitate or speed up a routine or necessary procedure
- 3.4 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.
- 3.5 you must not knowingly fail to challenge or report suspicions of bribery or corruption

4. Gifts or donations received by Age UK Sutton

- 4.1 Age UK Sutton in deciding whether to accept or decline a donation or gift will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.
- 4.2 An employee or 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.
- 4.3 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, advertising novelty or small seasonal gift 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 Age UK Sutton office where a decision will be made as to how to use the gift.
- 4.4 Age UK Sutton will not take gifts from organisations or individuals who participate in activities which:
- could cause detriment to the charity's reputation
 - will disproportionately decrease the amount of donations to further the work of the charity.
 - undermine our vision and values
 - are associated with unsuitable products, corporate and individuals e.g. arms dealings and tobacco
 - are from individuals, groups or organisations which are known to take advantage of older or vulnerable people.

- are personal gifts to Age UK Sutton staff members, which should be discouraged at all times
 - are from unknown sources of funding. Age UK Sutton will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.
 - potentially harm our relationships with other donors, service users, stakeholders or volunteers.
 - expose us to undue adverse publicity or reputational risk.
 - require unacceptable expenditure or additional charity resources
- 4.5 If supporters wish to make a donation to a specific area of Age UK Sutton's work then they make a specified donation by providing written instruction to this effect with their donation. Age UK Sutton will always respect this. If Age UK Sutton is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way Age UK Sutton will refund the donation.
- 4.6 Refusals of donations or gifts
- 4.6.1 If a gift is received which may not be acceptable under the terms of this policy the Head of Finance or Fundraising Manager will alert the Director of Development and Communications and the CEO at the earliest opportunity. This will be researched further and the matter will be referred to the board with the necessary information regarding the donation.
- 4.7 Donation or Gift processing
- 4.7.1 All donations or gifts must be conveyed to the Head of Finance or finance officer at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be filed by the Finance team. A receipt of donation form should also be completed with the donor, including their full name and contact details, and address
- 4.7.2 On receipt, all donations should be processed through the donation record management system, which is maintained by the Fundraising Manager.
- 4.7.3 It shall be the responsibility of the Managers and other senior staff to inform the Head of Finance when a donation or gift is received. It shall be the responsibility of the Head of Finance to record and ensure acknowledgement of receipt of all donations and gifts. Supporter anonymity will be protected whenever specified.

- 4.7.4 When donations or gifts are received, a completed receipt of donations form must accompany them. The finance team is responsible for allocating the donation to the appropriate fund as described on the form by the fundraising office.
- 4.8 A 'Receipt of Donation' sheet will be completed by the manager and the following information must be included on the sheet:
- The donor's name and complete address must be provided. If the gift is from other than an individual i.e. corporation, organisation, charitable trust, etc. a contact name and job title should be reported in addition to that of the company.
 - Email address (where available) and telephone number of the donor
 - Date of gift received
 - Other special instructions i.e. is this a specified or unspecified donation.
 - Does the donor require notification of when the donation was spent or what it was spent on?
 - Upon receipt of a unique donation (i.e. restricted (for a specific purpose) or unrestricted (for any charitable purpose) donation) and the appropriate supporting documents the Head of Finance will record the donation and send acknowledgement of receipt to the donor.
 - Is the donor happy for their donation to be acknowledged publicly e.g. on the AUKS website / in the AUKS annual report
- 4.9 Gifts in memoriam - donations or gifts to honour, in remembrance or otherwise recognise individuals, whether the donor is living or by bequest, will be received by the Head of Finance. It will be the policy of the Age UK Sutton not only to receive such gifts but also encourage efforts to remember and honour donors.

5 Giving gifts and hospitality

- 5.2 Staff, volunteers, and all others as set out in 1.2, above, or any member of their family/friends should not, directly or through others, offer or give any, money, gifts, hospitality 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 AUKS.
- 5.3 Staff, volunteers and all others as set out in 2.1 above, may with management approval give gifts of a nominal value up to £15, or provide meals, provided that the expenses are kept within a reasonable and approved level. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the name of AUKS, not your name.

6 Record-Keeping

- 6.2 You must declare all hospitality and gifts given or received and enter them into the **Gifts Register**. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our **Salary and Expenses Policy** and record the reason for expenditure. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

7 How to raise a concern

- 7.2 If any member of staff, volunteer or any other party as set out in 2.1 above, 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 or the CEO who will treat any such information in confidence or they should report it in accordance with our **Whistleblowing Policy** as soon as possible.
- 7.3 Staff and volunteers should also consult their manager if they have any questions – however minor - about the interpretation and application of this policy.

8 Measurement and Monitoring

- 8.2 Overall responsibility for monitoring the effectiveness of this policy lies with the CEO, SMT and the Trustees. All staff, volunteers and trustees are committed to implementing this policy.
- 8.3 Age UK Sutton will comply with the requirements of the General Data Protection Regulation & Data Protection Act 2018 in the way that any data is stored and used

Appendix 1

The Law

All staff and volunteers are required to comply with The Bribery Act 2010. The Chief Executive Officer (CEO) is responsible for the policy in relation to The Bribery Act 2010. A breach of these rules and guidelines will be regarded as a serious matter which may lead to disciplinary action.

The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution:

- the liability to prosecution if a person associated with AUKS bribes another person....., where an associated person is one who performs services on or behalf of the organisation; and
- bribery of a foreign public official, where an official is one who holds a legislative, administrative or judicial position in a territory or country outside the UK.

This means that Age UK Sutton needs to take care to ensure that any contractors, sub-contractors, agents or business partners acting on its behalf comply with the Act.

Charities risk losing support if there is a perception amongst the public (justified or not) that charity funds are being applied lavishly or wastefully. Similarly, trustees need to remember that accepting hospitality beyond the reasonable minimum, even if it costs the charity nothing, can give an impression of an inappropriate culture of extravagance, or inappropriate influence.