



Bridging the Gap (Manchester)

Anti-Bribery & Anti-Corruption Policy

Registered Charity Number: 1170952

This policy and guidance will be reviewed every 2 years or in line with any legislative changes. This will ensure that this document is current and fit for purpose.

This policy should be read in conjunction with: -

- **Whistleblowing Policy & Procedure**
- **Disciplinary and Grievance Policy & Procedure**

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1. Purpose

The purpose of this policy is to set out the responsibilities of Bridging the Gap (BTG) and those who work for the organisation in regards to observing and upholding our zero-tolerance position on bribery and corruption.

The policy also acts as a source of information and guidance for anyone working for BTG. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

BTG is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented.

BTG has zero-tolerance for bribery and corrupt activities. It is committed to acting professionally, fairly, and with integrity in all business dealings and relationships. BTG will constantly uphold all laws relating to anti-bribery and corruption in all the areas in which we operate. BTG is bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct.

BTG acknowledges that bribery and corruption are offences punishable by up to ten years of imprisonment and a fine and if it took part in corruption the organisation could be subject to: -

- an unlimited fine
- exclusion from tendering for public contracts
- irreparable damage to its public image and reputation.

With this in mind BTG is committed to preventing bribery and corruption occurring in its business, and it takes its legal responsibilities seriously.

3. Scope of the policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), volunteers, consultants, any other person(s) associated with BTG (including third parties), or any of our subsidiaries or their employees. This policy also applies to BTG's Trustee Board.

In the context of this policy, third-party refers to any individual or organisation BTG meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, which includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements BTG makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with.

4. Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public officer. They must not accept bribes to any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Trustee Board.

5. What is and What is NOT acceptable

This section of the policy refers to four areas: -

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

5.1 Gifts and hospitality

BTG accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of a gift meets the following requirements: -

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the organisation and not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to an organisation for helping with a large project upon completion).

- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the Trustee Board (usually in excess of £100).
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Trustee Board.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Trustee Board who will assess the circumstances.

BTG recognises that the practice of giving and receiving business gifts varies for instance between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will inevitably differ in each scenario.

As good practice, gifts given and received should always be disclosed to the Chair of Trustees. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Chair of Trustees should be sought.

5.2 Facilitation Payments and Kickbacks

Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

BTG recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Furthermore it is aware that this type of payment tends to be made by low level officials with the intention of securing or speeding-up the performance of a certain duty or action.

BTG does not accept and will not make any form of facilitation payments of any nature.

Kickbacks are typically payments made in exchange for a business favour or advantage. BTG does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

BTG recognises that, despite our strict policy on facilitation payments and kickbacks, its employees may face a situation where avoiding a facilitation payment or kickback may be difficult. Under these circumstances, the following steps must be taken: -

- Keep any amount to the minimum
- Ask for a receipt, detailing the amount and reason for the payment
- Create a record concerning the payment
- Report this incident to your line manager.

5.3 Political Contributions

BTG will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. It recognises such donations may be perceived as an attempt to gain an improper business advantage.

5.4 Charitable Contributions

BTG accepts (and indeed encourages) the act of donating to charities, whether through services, knowledge, time, or direct financial contributions. BTG agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

BTG will ensure that all charitable donations made are legal and ethical under UK laws and practices, and that donations are not offered/made without the approval of the Board of Trustees.

6. Employee Responsibilities

All employees of BTG must read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information they are given.

All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If an employee has reason to believe or suspect that an instance of bribery or corruption has occurred, or will occur in the future, that breaches this policy, the employee must notify the Chair of Trustees.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The Trustee Board has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

7. What happens if I need to raise a concern?

This section of the policy covers three areas: -

- How to raise a concern
- What to do if you are a victim of bribery or corruption
- Protection

7.1 How to raise a concern

If an employee suspects that there is an instance of bribery or corrupt activities occurring in relation to BTG, they are encouraged to raise these concerns at as early a stage as possible. If uncertain about whether a particular action or behaviour could be considered bribery or corruption, they should speak to their line manager or member of the Trustee Board.

BTG will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

7.2 What to do if you are a victim of bribery or corruption

The employee must tell their line manager as soon as possible if they : -

- are offered a bribe by anyone
- are asked to make a bribe
- suspect that they may be bribed
- are asked to make a bribe in the near future
- have reason to believe that they are a victim of another corrupt activity.

7.3 Protection

If an employee refuses to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, BTG understands that the employee may feel worried about potential repercussions. BTG will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

BTG will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

If an employee has reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform their line manager or the Chair of Trustees immediately.

8. Training and communication

BTG will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

BTG's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

BTG will provide relevant anti-bribery and corruption training to employees where it feels their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

9. Record keeping

BTG will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount of, and reason for, hospitality or gifts accepted and given. It is understood that gifts and acts of hospitality are subject to Trustee Board review.

10. Monitoring and reviewing

The Board of Trustees are responsible for monitoring the effectiveness of this policy and will review the implementation annually. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Board of Trustees.

This policy does not form part of an employee's contract of employment and BTG may amend it at any time to improve its effectiveness at combating bribery and corruption.