



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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Reviewed by: Michelle McHale

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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.

This policy also provides information and guidance to help individuals recognise, prevent, and appropriately respond to bribery and corruption risks.

2. Policy statement

BTG is committed to conducting its work ethically, honestly, and with integrity. We are committed to implementing and enforcing systems that prevent bribery and corruption in all forms.

BTG has a zero-tolerance approach to bribery and corrupt activities. We will act professionally, fairly, and transparently in all business dealings and relationships. BTG will uphold all relevant UK laws, including the Bribery Act 2010.

BTG acknowledges that bribery and corruption are criminal offences punishable by up to ten years' imprisonment and an unlimited fine. If BTG were found to have engaged in corrupt practices, the organisation could face:

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

BTG takes these responsibilities seriously and is committed to preventing bribery and corruption in all areas of its work.

3. Scope of the policy?

This policy applies to:

- all employees (temporary, fixed-term, or permanent)
- volunteers
- consultants
- contractors
- trustees
- any individual or organisation acting on behalf of BTG

For the purposes of this policy, a *third party* refers to any individual or organisation BTG interacts with, including clients, suppliers, distributors, agents, advisers, partners, and public bodies (including their officials, representatives, and politicians).

All arrangements with third parties must include clear contractual terms requiring compliance with this policy.

4. Bribery Risk Assessment

BTG will periodically assess the bribery and corruption risks it may face. This includes reviewing:

- procurement
- fundraising
- partnership working
- use of third-party representatives
- any international engagement

The Trustee Board will review bribery risk assessments annually, or sooner if significant organisational or legislative changes occur.

Findings will inform updates to this policy, staff training, and internal controls.

5. 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 includes both offering and accepting a bribe. Employees must not:

- engage in bribery directly or indirectly
- use third parties to facilitate bribery
- bribe foreign public officials
- accept bribes of any kind

If unsure whether something constitutes a bribe, employees must seek advice from the Chair of Trustees.

6. What is and What is NOT acceptable

6.1 Gifts and hospitality

BTG accepts normal and appropriate hospitality and goodwill gestures, provided that:

- they are not intended to influence a decision or secure an improper advantage
- no return favour is expected
- they comply with local law
- they are given in the organisation's name, not an individual's
- they do not include cash or cash equivalents
- they are appropriate in type, timing, and value
- they are given or received openly
- they are not targeted at influential individuals to improperly influence them
- they are not offered to or accepted from government officials or politicians without prior approval

Where declining a gift would cause cultural offence, it may be accepted but must be declared to the Chair of Trustees.

Gift Value Threshold

- Gifts or hospitality valued at **over £100** require prior approval from the Chair of Trustees.
- Where prior approval is not possible, the gift must be declared immediately afterwards.

Gifts and Hospitality Register

BTG will maintain a central register. **All gifts or hospitality offered, given, or received — regardless of value — must be recorded within five working days.**

6.2 Facilitation Payments and Kickbacks

Facilitation payments — small payments to speed up routine actions — are illegal under UK law. BTG does not permit them under any circumstances.

Kickbacks — payments made in return for a business advantage — are also prohibited.

If an employee is placed in a situation where refusing a facilitation payment is unsafe or impossible, they must:

- keep the amount to the minimum
- request a receipt
- record the incident
- report it to their line manager

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

6.3 Political Contributions

BTG will not make political donations of any kind. Such contributions may be perceived as attempts to gain improper influence.

6.4 Charitable Contributions

BTG encourages charitable giving but must ensure donations are not used to disguise bribery.

All charitable donations must:

- be legal and ethical
- be approved by the Board of Trustees
- be transparently recorded

7. Employee Responsibilities

All employees must read, understand, and comply with this policy and any related training.

Employees must:

- prevent, detect, and report bribery
- avoid activities that could lead to a breach
- declare any conflicts of interest immediately

Failure to comply may result in disciplinary action, including dismissal.

Conflicts of Interest

Employees, volunteers, and trustees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of BTG. Any actual or potential conflict of interest must be declared to the Chair of Trustees as soon as it arises.

Failure to declare a conflict may be treated as a breach of this 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.

7.1 Third-Party Breaches

BTG expects all third parties acting on its behalf — including suppliers, contractors, consultants, and partner organisations — to comply with this Anti-Bribery and Anti-Corruption Policy. If a third party breaches this policy, or if BTG reasonably suspects that bribery or corruption has occurred, BTG reserves the right to suspend or terminate the relationship immediately. BTG may also report the matter to relevant authorities where appropriate. All contracts and agreements with third parties must include clauses requiring compliance with this policy.

7.2 Third Party Due Diligence

BTG staff must undertake proportionate due diligence on all third parties with whom it engages, including suppliers, contractors, consultants, and partner organisations. This may include checks on:

- ownership and reputation
- financial integrity
- links to public officials
- previous allegations or incidents of bribery or corruption
- alignment with BTG's ethical standards

BTG reserves the right to refuse, suspend or terminate relationships immediately where concerns arise.

BTG may also report the matter to relevant authorities where appropriate.

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

Employees should raise concerns about suspected bribery as early as possible with their line manager or a Trustee. BTG will ensure staff are familiar with whistleblowing procedures.

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

8.1 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.

BTG will ensure staff are familiar with whistleblowing procedures.

8.2 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.

8.3 Protection

BTG will support anyone who raises concerns in good faith, even if mistaken. No one will suffer detrimental treatment for refusing to engage in bribery or for reporting concerns.

Detrimental treatment includes dismissal, disciplinary action, threats, or unfavourable treatment.

Anyone who believes they have been treated unfairly should inform their line manager or the Chair of Trustees.

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9. 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.

