Anti-bribery policy
(for volunteers and others connected with the charity who are not employees)

Background
The Bribery Act 2010 came into force on 1 July 2011. It creates various new offences, including an offence which can be committed by commercial companies that fail to prevent persons associated with that company from committing bribery on their behalf. This applies regardless of whether the person works or commits the offence in the UK or any other country in which the charity operates. However, it is a full defence for a company if it can prove that despite the bribery occurring, it has adequate procedures in place to prevent those persons associated with it from committing bribery. The charity's procedures must be proportionate to the bribery risks that it faces in relation to the nature, scale and complexity of the charity. The relevant information for employees is on pages 54–56 of the Employee Handbook (September 2025 full handbook update). This standalone version of the policy is for volunteers and others connected with the charity who are not employees.

1. Introduction

The charity and its directors are committed to the prevention of bribery by those employed and associated with it. The charity is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery.
This is achieved by:

a. carrying out a risk assessment to ascertain the risk of bribery;
b. instigating procedures proportionate to that risk;
c. having good internal controls and record-keeping;
d. securing the commitment of directors, managers and all employees to the prevention and detection of bribery;
e. developing a culture in which bribery is unacceptable;
f. undertaking due diligence procedures proportionate to the assessed risk of bribery;
g. effectively communicating the anti-bribery policy to all employees and volunteers;
h. training all employees and volunteers to recognise bribery so that they can avoid it and be alert to possible instances of bribery;
i. having clear procedures on what to do should bribery be suspected;
j. monitoring and reviewing the effectiveness of the bribery procedures and updating them as necessary to ensure that they remain effective.

2. Scope

This policy applies to all those volunteering for, or associated with the charity, who are not employees. For employees, the relevant information is included in the Employee Handbook.

3. **Offering bribes**

The charity expressly prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is believed that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

4. **Accepting bribes**

The charity expressly prohibits any person employed by or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly. The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

5. **Bribing a public official**

The charity expressly prohibits the bribing of a UK or foreign public official in order to obtain or retain business or an advantage in the conduct of business.

6. **Relevant functions and activities**

Relevant functions and activities are any function of a public nature, any activity connected with the charity, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

7. **Hospitality and business gifts**

The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business. However, hospitality, promotional and similar business expenditure can be used as bribes.

The charity expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts:

a. All offers of business gifts should be referred to the anti-bribery officer and should only be accepted if clearance has been received from him or her.
b. Business gifts should not be made without the permission of the anti-bribery officer.
c. A record of all business gifts made and received and the reason for the gift should be retained.
d. All hospitality must be proportionate and reasonable and in line with the charity's hospitality policy. Guidance should be sought from the anti-bribery officer as to whether the planned hospitality is proportionate and reasonable.
e. Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality.

f. Quid pro quo arrangements are expressly prohibited.
g. Cash gifts are expressly prohibited.
h. The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
i. Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
j. The provision of small promotional gifts, such as diaries, pens or similar, will generally be regarded as acceptable.
k. Employees reviewing expense claims should be alert to the provision of hospitality/business gifts that may be construed as a bribe.
l. All concerns should be reported.

8. Donations

The charity expressly prohibits the giving of donations to political parties. Any charitable donation must be consistent with the charity's policy on charitable giving and with the knowledge and consent of the anti-bribery officer.
The charity expressly prohibits the making of charitable donations where the purpose of the donation is to secure an advantage. All charitable donations must be made without expectation of reward.

9. Modern Slavery

The charity expressly prohibits managers, consultants and recruiters from accepting bribes or inducements to recruit or favour employees or to commit any form of physical or mental mistreatment, bullying or harassment.

10. Reporting concerns

All employees and volunteers have a responsibility to prevent, detect and report all instances of bribery. Employees and volunteers should therefore be alert to the possibility of bribery.

Anyone who has concerns regarding acts or potential acts of bribery should speak to their line manager in the first instance. If for any reason a person is not able to speak to his or her line manager, he or she should contact the anti-bribery officer (Chief Executive).
All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the anti-bribery officer.

Further information about reporting concerns is available in the charity's whistleblowing policy.

11. Responsible officer

The Chief Executive is responsible for monitoring the anti-bribery policy and all questions and concerns should be referred to him.

12. Sanctions

The charity treats breaches of the anti-bribery policy with maximum seriousness and will investigate any potential breach. The ultimate sanction for a breach of the policy will be summary dismissal for gross misconduct.

Distribution	This policy will be made available to trustees, volunteers and associates
Original Policy Date	This originated as the Anti-Corruption and Bribery Policy, applicable to employees and volunteers
Date of Approval	This policy was approved by the Board of trustees in March 2026
Date of next scheduled review	This policy is due to be reviewed by the Board of trustees in March 2029