

## **ANTI-BRIBERY POLICY**

### **1.0 Definition**

- 1.1 The Chichester Diocesan Fund and Board of Finance (“the DBF”) recognises its duty to comply with the Bribery Act 2010, which came into force on 1 July 2011. Furthermore the DBF is committed to conducting all of its business in an honest and ethical manner, and acting professionally, fairly and with integrity in all its business dealings and relationships.
- 1.2 Bribery is the giving or accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.
- 1.3 Offering or receiving an advantage could count as a bribe if any of the following is offered or given in return:
- Award of contract to particular bidder.
  - Recommending a particular supplier.
  - Obtaining information that would put an individual or organisation at an advantage, such as information about a competitive tender.
  - Any other preferential treatment influenced by the receipt of an advantage.
- 1.4 The following would not usually count as bribes:
- Payment of an official charge.
  - Normal hospitality provided in the course of business, such as provision or acceptance of a modest meal at a working event.
- 1.5 Whether a provision of a particular item or service counts as a bribe depends upon the context and level of hospitality offered. The Bribery Act is not intended to prohibit reasonable and proportionate hospitality or business expenditure. Judgement is required and the decision depends upon level of hospitality provided and the level of influence the person receiving it had on the business decision in question.
- 1.6 The purpose of this policy is to set out the rules that must be followed in the DBF by all trustees and members of staff whether full-time, part-time or voluntary to ensure that no bribery occurs.

### **2.0 Unacceptable behaviour**

- 2.1 The following behaviour is unacceptable, and must not occur:
- Accepting any financial or other reward from any person in return for providing some favour
  - Requesting a financial or other reward from any person in return for providing some favour
  - Offering any financial or other reward from any person in return for providing some favour.

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### **3.0 Business gifts**

- 3.1 From time to time, those we serve, suppliers or other persons might offer a gift to an employee.
- 3.2 This could be a small item, or something of considerable value. All gifts, however small, must be reported to the Diocesan Secretary and recorded. Gifts, other than gifts of nominal value and a promotional nature, e.g. calendars, diaries and other similar articles which can be used at the place of work, should be provided to the Diocesan Secretary who will decide whether to permit the employee to retain it, return it or retain it for an end of year raffle.
- 3.3 No gifts with a value of more than £50 may be accepted. If a gift is offered and then refused because of its value, this must be reported to the Diocesan Secretary.
- 3.4 Gifts do not include small items which are made available at public conferences or meetings if those gifts are available to all attendees.

### **4.0 Hospitality**

- 4.1 From time to time, those we serve, suppliers or other persons might invite an employee to a hospitality event.
- 4.2 All such invitations must be reported to the Diocesan Secretary. Permission must be given by the Diocesan Secretary before an employee accepts any invitation.
- 4.3 Hospitality events do not include the provision of reasonable refreshments at conferences, meetings or training events. These do not need to be reported.

### **5.0 Offering gifts and hospitality**

- 5.1 It is not the DBF custom to offer small gifts (e.g. pens, diaries, note books) to those we serve, suppliers and other persons.
- 5.2 If a gift is authorised by the Diocesan Secretary, the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.
- 5.3 The DBF occasionally run hospitality events, primarily aimed at thanking volunteers, office-holders and suppliers for their service and loyalty. An employee must not organise any additional hospitality event without seeking authority from the Diocesan Secretary.

### **6.0 Responsibilities of the Diocesan Secretary**

- 6.1 The Diocesan Secretary is responsible for keeping a record of all gifts and hospitality that are offered to and by and/or received by employees.
- 6.2 If the Diocesan Secretary is concerned about any actions, they should contact the HR Officer immediately for advice.

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6.3 The Diocesan Secretary is also responsible for ensuring that all employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

### **7.0 Expenses**

7.1 Line Managers must authorise all expense claims from their employees. All expenses are expected to be checked and signed with receipts provided.

7.2 Any items of expenditure that give rise to concern should be fully investigated in line with the DBF's Disciplinary Policy and Procedure.

7.3 Further information and requirements are outlined in the DBF's Expenses Policy and Financial Policies and Procedures.

### **8.0 Attempts to bribe**

8.1 Any employee who is concerned that he or she is potentially being bribed should report this matter to the Diocesan Secretary at the earliest opportunity.

### **9.0 Donations to organisations**

9.1 No donations should be made to charities, political parties or other organisations with the intention of gaining any advantage.

9.2 The DBF will carry out checks to ensure that a donation to the DBF is not accepted if there is suspicion that the donation has been made as an incentive to conduct business improperly.

### **10.0 Disciplinary action**

10.1 Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct in line with the DBF's Disciplinary Policy and Procedure. In addition any potential criminal matters will be reported to the police.

### **11.0 Raising concerns**

11.1 If an employee is concerned that acts of bribery are occurring in the DBF they should inform their line manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.

### **12.0 Review**

12.1 This policy shall be reviewed on an annual basis. The next review is due in October 2018.

### **13.0 Revision History**

## ANTI-BRIBERY POLICY

Revision No.	Date Issued	Prepared By	Approved	Comments
1	20 October 2017	GH	Bishop's Council 19 October 2017	New policy