

Anti-Bribery Policy

1. Introduction

This policy is to assist and promote our Association values and expectations of employees to ensure that ethical behavior is demonstrated at all times.

We also intend for it to provide clarity when communicating with customers or providers to ensure that our reputation is protected against any potential bribery claim.

Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery

In support of our commitment to maintaining the highest possible standards of business practice our stance on bribery is one of 'zero-tolerance'. Bribery is illegal and as such has no place in our organisation.

2. The Policy

In accordance with the Bribery Act 2010 the Association prohibits the offering, giving, solicitation or acceptance of any bribe:

Whether cash or other inducement, regardless of size or value

To or from any person or Association, wherever they are situated and whether they are a public official or body or private person or Association

By any individual employee, agent or other person or body acting on behalf of the Association

In order to gain any commercial, contractual or monetary exchange, or otherwise, for the individual or anyone connected with the individual

Including facilitation payments made to public officials for securing or accelerating routine processes and procedures.

3. Interpreting the Policy

It is not the intention of the policy to prevent the following activities:

- Normal and appropriate hospitality
- The giving and receiving of ceremonial gifts
- Such hospitality or gifts must be in moderation and not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return

If there is any doubt as to whether an action might constitute bribery, the matter should be referred to an Association Trustee for a decision.

4. Preventing and Reporting Bribery

All employees have a responsibility to prevent, detect and report bribery.

Any suspicion of bribery or attempted bribery committed by or against an employee, agent or other party acting on behalf of the Association must be reported immediately to an Association Trustee or the Chief Executive.

A Gifts and Hospitality register is in place to record any items or invitations of a value of £20 or more.

The Association's Whistleblowing Policy and Procedure is in place to protect anyone reporting reasonable suspicions.

Any breach of these rules may result in disciplinary action being taken which is likely to result in summary dismissal on the grounds of gross misconduct.

