



Anti-bribery and Corruption policy

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Version 2

It is the policy of The Proud Trust (TPT) to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and professional dealings and to implement effective systems to counter bribery.

1. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, professional, regulatory or personal advantage.

It is an offence to offer a bribe or to receive a bribe.

1.2 We will uphold all laws including the Bribery Act 2010 relevant to countering bribery and corruption.

1.3 The purpose of this policy is to:

- (a) set out our responsibilities, and for those working for us, in observing and upholding our position on bribery and corruption;
- (b) provide information and guidance to staff and volunteers on how to recognise and deal with bribery and corruption issues.
- c) ensure that the issue of bribery, declaring any gifts or conflicting interests is standing item on the Trustees' agenda

1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could

face an unlimited fine, as well as, damage to our reputation. We therefore take our legal responsibilities very seriously.

1.5 We have identified that certain activities create particular risks for our organisation, in particular:

- Recruitment of employees, volunteers and students;
- Receipt of gifts and donations;
- Grant funding;
- Public 'procurement', particularly where the activities relate to construction.

1.6 To address these risks we have taken the following steps:

- Implemented an anti-bribery and corruption policy;
- Ensured that the issue of bribery and corruption is a regular standing item on the Trustees' agenda;
- Regularly review the issue at staff meetings and with volunteers so that both staff and volunteers understand the issue and can take steps to guard against it;
- Created a register of gifts which are logged with the Deputy CEO who will then seek guidance from Trustees on any gifts deemed to compromise any parties;
- Ensured that the issues of bribery and corruption will be part of the regular staff and volunteers training programme.

2. Who is covered by this policy?

This policy applies to all individuals involved in the organisation including trustees, employees and volunteers, students on placement and any other person associated with The Proud Trust

3. What is not acceptable?

It is not acceptable for trustees, staff or volunteers (or someone acting on their behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a professional advantage will be received, or to reward a professional advantage already given;
- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (c) accept payment from a third party which is offered with the expectation that it will obtain a professional advantage for them;
- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a professional advantage will be provided by us in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy;
- (f) engage in any activity that might lead to a breach of this policy.

4. Donations

We do not make charitable donations or contributions to political parties.

5. The responsibilities of The Proud Trust

5.1 All trustees, staff and volunteers must ensure that they have read, understand and will comply with this policy.

5.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working/ volunteering for The Proud Trust. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

5.3 Trustees, staff and volunteers must notify either their line manager, the CEO / Deputy CEO or the Chair of Trustees of The Proud Trust as soon as possible, if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

5.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

6. Record-keeping

6.1 There are financial records and appropriate internal controls in place which will evidence the reason for making payments to third parties.

6.2 A written record is kept of all hospitality or gifts accepted or offered, which will be subject to managerial/trustee review,

6.3 All expenses claims relating to hospitality, gifts or expenses are submitted in accordance with expenses policies and specifically record the reason for the expenditure.

6.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, will be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

7. How to raise concern

Trustees, staff and volunteers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If there is any doubt whether a particular act constitutes bribery or corruption, or if there are any other queries, these should be raised with your line manager and/or the Trustees.

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

8.1 Trustees, staff and volunteers must notify either their line manager, the CEO / Deputy CEO or the Chair of Trustees of The Proud Trust as soon as possible, if any person is offered a bribe by a third party, is asked to make one, or suspects that this may happen in the future.

8.2 Line management should be used unless the issue is with a manager, in which case this person can be bypassed to raise an issue.

9. Protection

9.1 Trustees, staff or volunteers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that

you have suffered any such treatment, you should inform your line manager, the CEO / Deputy CEO or the Chair of Trustees of The Proud Trust as soon as possible. If the matter is not remedied, and you are an employee, you should raise it formally using the Discipline and Grievance Procedure.

10. Training and communication

10.1 All existing workers operating in areas that are perceived as high risk as far as the Bribery Act is concerned will receive regular, relevant training on how to implement and adhere to this policy.

10.2 The Proud Trust's zero-tolerance approach to bribery and corruption must be communicated to all partners, suppliers, contractors at the outset of the professional relationship with them and as appropriate thereafter.

11. Who is responsible for the policy?

11.1 The Trustees and the Senior Management Team of The Proud Trust have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it.