

## **A Background**

1. Bribery is a criminal offence. The Church and those acting on its behalf does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does it or will it, accept bribes or improper inducements, or use a third party as a conduit to channel bribes.

## **B Objective of this policy**

1. This policy provides a framework to enable those acting on behalf of the Church to understand and implement arrangements enabling compliance.
2. The Church requires that all personnel, including those permanently employed, office holders, trustees, volunteers, temporary agency staff and contractors:
  - act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible
  - comply with the spirit, as well as the letter, of the law

## **C Scope of this policy**

1. This policy applies to all of the Church's activities and covers all personnel, including those permanently employed, temporary agency staff, contractors, trustees, agents, volunteers and consultants.

## **D Commitment**

The Church commits to:

1. Setting out a clear anti-bribery policy and keeping it up to date
2. Making all employees aware of their responsibilities to adhere strictly to this policy at all times
3. Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
4. Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution

## **E Bribery**

1. Is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

## **F The Bribery Act**

1. There are four key offences under the Act:
  - bribery of another person (section 1)
  - accepting a bribe (section 2)
  - bribing a foreign official (section 6)
  - failing to prevent bribery (section 7)

2. The Bribery Act 2010 ([http://www.opsi.gov.uk/acts/acts2010/ukpga\\_20100023\\_en\\_1](http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1)) makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2).

## **G Bribery is not tolerated**

It is unacceptable to:

1. give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
2. 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
3. accept payment, a gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them

## **H Facilitation payments**

1. Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

## **I Gifts and hospitality**

1. The Act does not prohibit genuine hospitality. Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable but should be declared by notifying the Church Administrator who will keep a register (which can be delegated to the Church Office) of gifts and hospitality received.

## **J Staff and Volunteer responsibilities**

1. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Church in a paid or voluntary capacity.
2. You must:
  - ensure that you read, understand and comply with this policy
  - raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
  - As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal.

## **K Raising a concern**

1. The Church is committed to ensuring that everyone has a safe, reliable, and confidential way of reporting any suspicious activity.
2. If you have a concern regarding a suspected instance of bribery or corruption, please talk to the Church Administrator or Senior Pastor as soon as you have concerns.
3. The Church is committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.