

## Anti-Bribery and Corruption Policy

Date	Review Date	Chairman	Vice-Chair	Centre Manager
01.08.18	01.08.19	Neil Jones	Anne Everitt	Sally Mills

The following are important telephone numbers that must be kept up to date:

Contacts	Home	Mobile
Chairman of Trustees Neil Jones		
Vice-Chair Anne Everitt		
Centre Manager Sally Mills	01483 813846	

The purpose of this document is to provide information and guidance to help The Therapy Garden deal with bribery and corruption issues and understand everyone's responsibilities to observe and uphold a zero-tolerance position on bribery and corruption.

### 1. Policy Statement

The Therapy Garden is committed to conducting business in an ethical and honest manner and to implement and enforce systems that ensure bribery is prevented. We have a zero-tolerance policy for bribery and corrupt activities and are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

We will constantly uphold all laws relating to anti-bribery and corruption and are bound by the laws of the UK, including the Bribery Act 2010.

Bribery and corruption are punishable by up to 10 years imprisonment, can incur an unlimited fine and cause damage to our reputation.

### 2. Who is covered by this policy?

This policy applies to all employees, volunteers and the board of trustees as well as any other person or persons associated with us, including third parties.

Third parties refers to any individual or organisation The Therapy Garden meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public bodies.

### 3. Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or an advantage to induce or influence an action or decision.

A bribe refers to any inducement, reward or item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery whether it be directly, passively or through a third party.

#### 4. Gifts and Hospitality

The Therapy Garden accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gift meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given to obtain or reward the retention of a business or a business advantage. It cannot be an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected
- It is in compliance with local law
- It is given in the name of the company, not the individual
- It does not include cash or a cash equivalent
- It is appropriate for the circumstances (small gifts at Christmas etc.)
- It is appropriate type and value and given at an appropriate time, taking into account the reason for the gift
- It is given/received openly, not secretly
- It is not given to a key, influential person with the intention of directly influencing them
- It is not above a certain excessive value, as pre-determined by the Board of Trustees (usually in excess of £100)
- It is not offered to or accepted from a government official or representative or politician or political party

Where it is inappropriate to decline the offer of gift (e.g. when meeting an individual of a certain religion/culture who may take offence) the gift may be accepted as long as it is declared to the Centre Manager.

All gifts (given and received) should be logged into the 'Register of Gifts' located on the charity network system.

The intention behind a gift being given/received should always be considered. If in doubt, check with the Centre Manager.

#### 5. Political Contributions

The Therapy Garden will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper advantage.

#### 6. Employee Responsibilities

The Therapy Garden expects all employees to read, understand and comply with the terms set out in this policy.

Everyone is equally responsible for the prevention, detection and reporting of bribery and other forms of corruption and are required to avoid any activities that could lead to a breach, or implied breach, of this policy.

If you believe or suspect that an instance of bribery or corruption has taken place that breaches this policy, the Centre Manager must be notified.

The Therapy Garden has the right to give disciplinary action or dismiss individuals for gross misconduct if a breach of this policy is found.

## 6. Raising A Concern

If bribery or corrupt activities is suspected, you should raise your concern as early as possible with the Centre Manager.

Please refer to the Whistleblowing Policy for advice on confidentiality and procedures.

You must tell the Centre Manager as soon as possible if you are –

- Offered a bribe
- Asked to make a bribe
- Suspect you have been bribed
- Suspect you have been/will be asked to make a bribe
- Reason to believe you are the victim of a corrupt activity

The Therapy Garden will support anyone who raises a concern in good faith under this policy, even if investigation finds they were mistaken. No one will suffer any detrimental treatment (dismissal, disciplinary action, treats or unfavourable treatment) as a result of refusing to accept or offer a bribe or for reporting a concern relating to potential bribery or corruption.

If you believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, please speak to the Centre Manager.

## 7. Policy Reviews

Any questions regarding the policy should be directed to the Centre Manager. The policy may be amended at any time.

The policy should be reviewed in the light of any trends or new legal changes and at least once every two years.

## 8. Linked Policies

- Complaints Policy
- Disciplinary Policy
- Whistleblowing
- Financial Policy

## 9. Raising Awareness of this Policy

The Therapy Garden will raise awareness of this policy via:

- The Therapy Garden policy folder located in the Centre Manager's office containing all the charity's policies. Clients and third parties can request a copy of the policy if required. Staff and volunteers are to be informed when polices are updated.
- During staff and volunteer inductions
- Through emails to staff and volunteers when policies are updated
- The Therapy Garden policies are also available to view on the charity's website

This policy was adopted on 14 August 2018 by:

Chair of Trustees Neil Jones		Date:	
Vice-Chair of Trustees Anne Everitt		Date:	
Centre Manager Sally Mills		Date:	