



Old Mill Foundation

HOLISTIC CANCER SUPPORT CENTRE

Registered charity No. 1125120 Tel: 01792 851553

Anti-bribery Policy

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1. Purpose

1.1 It clarifies the duty of the organisation, along with its Staff and Volunteers, to maintain the highest possible ethical standards

1.2 Ensures that we are compliant with the Bribery Act 2010 which prohibits the offering, the giving, the solicitation or acceptance of any bribe, whether as cash or any other kind of inducement

2. Procedure

2.1 All Staff and Volunteers must immediately report any incidence of bribery, whether actual or perceived, to our CEO or Chair of Trustees

2.2 All Staff and Volunteers need to gain permission from our CEO for any of the following activities so that they are not confused with activities which could be construed as being acts of bribery

- a) Acts of hospitality
- b) Giving and receiving gifts
- c) Giving prizes
- d) Anything else where there is potential for personal gain

3. Responsibilities

3.1 The prevention, detection and reporting of bribery is ultimately the responsibility of the Trustees

3.2 The CEO is ultimately responsible for ensuring that this policy is communicated to and understood by all our Staff and Volunteers

4. Scope

4.1 A bribe is an inducement or reward offered, promised or provided to gain any commercial, contracted, regulatory, monetary, financial or other personal advantage

4.2 It applies to any Trustee, Staff member (employees and contractors) or Volunteer including anybody acting on behalf of the organisation and anyone connected with the individuals mentioned

5. Costs

5.1 Communicating this policy and training to raise awareness of reporting procedure and risks associated with bribery

6. Associated policies

Data Protection

Disclosure and Barring Services

Equality & Diversity

Risk Management

Volunteer

Welsh

7. Changes

Reason for change	Section changed	Date changed	New version number
Out of date	None Added Welsh Policy	10 March 2020	V2

8. Policy dates

Trustee approval	10 March 2020
Review date	Every 3 years

Signed byDate.....

Name printed.....Position in organisation.....