

SKILLS & VOLUNTEERING CYMRU (SVC)



ANTI-BRIBERY POLICY & PROCEDURE

June 2023

	Anti-bribery Policy & Procedure
1.0	Purpose
1.1	<p>SVC is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery is prevented.</p> <p>SVC has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, and to upholding all laws relating to anti-bribery and corruption. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.</p> <p>In the course of our work, SVC staff, trustees or volunteers may be offered gifts, benefits or hospitality from suppliers or other people or organisations with which the charity has (or might have) business connections with. This includes the people our projects support and their families.</p> <p>The purpose of this Policy is to set out the rules regarding the Acceptance of Gifts, Benefits and Hospitality in order to protect the integrity of SVC from real or perceived influence or possible criticism and to ensure a consistent approach.</p> <p>It is important to ensure that no SVC staff, trustees or volunteers act in any way that is inconsistent with the organisation's objectives or with the integrity of the charity by accepting a gift in circumstances where it could influence or be seen to influence the SVC staff, trustees or volunteers' actions or decisions.</p> <p>This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. However, such gifts should be shared amongst other members of staff where appropriate.</p>
2.0	Scope of Policy
2.1	<p>This policy applies to: - All staff who support SVC All volunteers volunteering for SVC The SVC Board of trustees</p>
2.2	<p>In keeping with good practice SVC will regularly monitor and review the implementation of this policy and its procedures. The policy should be reviewed annually, or whenever there is a major change at SVC, or a change in relevant legislation.</p>
2.3	<p>It is hoped that all your questions relating to this policy have been clearly answered. If you have questions unanswered then please contact the Adrienne, the SVC Manager – A.EarlsSVCymru.org</p>
3.0	Definition of Bribery

3.1	<p>Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage to induce or influence an action or decision.</p> <p>A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.</p> <p>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.</p>
4.0 Policy Responsibilities	
4.1	<p>SVC staff, trustees and volunteers must:</p> <ul style="list-style-type: none"> • Exercise judgement in determining whether the acceptance of any gift, benefit or hospitality could reasonably be interpreted by others as an inducement which might place them or the charity under an obligation to the donor; • Not accept any gift, benefit or hospitality which they believe has been intended to place them, or the charity, under obligation to the donor; • Report to the SVC Manager any instance of being offered a gift, benefit or hospitality which they believe could have been intended as an inducement to place them or the charity under an obligation to the donor; • Not accept any gift, benefit or hospitality of a value of over £20 without prior discussion with the SVC Manager; • Record all accepted gifts, benefits or hospitality on a gift register as outlined below and held with the SVC Manager; and • Not seek for themselves or others any gift, benefit or hospitality that could be reasonably interpreted by others as an inducement which might place them or the charity under an obligation to the donor.
4.2 What is acceptable?	
	<ul style="list-style-type: none"> • 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, or as 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 in an individual's name. • It does not include cash or a cash equivalent (e.g. a voucher or gift certificate). • It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion). • It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift. • It is given/received openly, not secretly. • It is not of a value above £20.

	<ul style="list-style-type: none"> • SVC recognises that the practice of giving and receiving gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable may inevitably differ for each. Where an individual feels it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the SVC Manager, who will assess the circumstances.
	<p>5.0 Donations & Fundraising</p>
<p>5.1</p>	<p>SVC relies on donations, gifts, grants and sponsorships. Charitable donations should be made without expectation of return but it is best practice when a substantial donation is made to a charity for the recipient to acknowledge this in a public credit. Donors seeking substantial privileges should be avoided.</p> <p>Money laundering is a related risk and proportional, relevant checks will also be made to ensure that the source of funds comprising donations are legitimate.</p>
	<p>6.0 Summary</p>
<p>6.1</p>	<p>Staff, trustees and volunteers of SVC must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other anti- bribery and corruption information they are given.</p> <p>We are all equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Staff, trustees and volunteers of SVC are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy.</p> <p>If you have any concerns or questions regarding this policy, please contact the SVC Manager at A.Earls@SVCymru.org.</p>