

PO76 GIFTS AND ANTI-BRIBERY POLICY AND PROCEDURE

Policy

Introduction

This policy is to ensure that all employees and volunteers are aware of their responsibilities around accepting any gifts offered to them for any reason, and when they are required to report and/or refuse any such offer, whether or not it is accepted.

Guidance

Anti-Bribery and Corruption

Staff should agree that they will not offer, promise, give, request, agree to receive or accept any bribes:

- in the course of your employment or volunteering
- when conducting organisation business or
- when representing the organisation in any capacity.

A bribe means a financial payment or other form of reward or advantage, whether direct or indirect, that is intended to persuade or influence, or has the effect of persuading or influencing, an individual, company or public body to perform their functions, including business and public duties, improperly. For the avoidance of doubt, improper performance includes:

- not acting in good faith
- not acting impartially and
- not acting in accordance with a position of trust.

All staff must comply with this policy and procedure and agree to comply with all applicable bribery and corruption laws.

All staff agree to report any suspicious conduct that may amount to a bribe being offered, promised, given, requested or accepted (either involving you or another employee or person acting for, or on behalf of, the organisation) immediately to their Line Manager or the CEO in accordance with the anti-bribery policy and guidelines.

If CVS Falkirk suspects you of bribery, it is entitled to invoke its disciplinary procedures (PO51 Disciplinary) and suspend your employment while carrying out its investigations. CVS Falkirk is entitled to terminate your employment in writing without notice or pay in lieu of notice, without prejudice to any rights or claims it may have against you, if it is found by the organisation, or any other relevant public or legal authority, that you are guilty of bribery.

Personal Endeavours and Gifts

Employees and volunteers of CVS Falkirk must not seek to make personal gain from their association with us.

If you have a personal financial interest in a contract, whether direct or indirect, which has been or is proposed to be entered into by the organisation, you are required to give prior notice of the interest in writing to the Chief Executive Officer.

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Staff must not retain any fee or financial payment collected or received in connection with your role. There are certain circumstances when it may be unacceptable to retain a gift. An example of this would be anything which has a value of more than £10.00. However any sweets, biscuits or other consumables left by visitors can be accepted and shared amongst the whole team (normally by placing them on the table in the kitchen area).

Nevertheless it is your responsibility to contact the Chief Executive Officer (CEO) for advice and guidance before accepting anything that has a value or a perceived value in excess of £10.00 as to do so could be tantamount a breach of contract. For example a bouquet of flowers costing £6.99 is acceptable whilst a bottle of alcohol at £15.00 is unlikely to be; thus clarification must be sought before the item is accepted and/or removed from the office.

Responsibility

Overall responsibility for the implementation of this policy rests with the Line Managers, and ultimately the CEO. All staff are required to adhere to the policy and co-operate with its implementation and enforcement.

Related Policies:	PO51 Disciplinary		
Related Documents:	none		
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**May be reviewed earlier subject to changes in legislation*

