



Cary Cares: Anti-Bribery & Anti-Corruption Policy

This policy should be read in conjunction with Cary Cares Finance & Reserve Policy and other policy documents.

1. What does this policy cover?

1.1 This anti-bribery policy exists to set out the responsibilities of those who are trustees or volunteers of Cary Cares in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for Cary Cares. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

2.1 Cary Cares is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Cary Cares has zero-tolerance for bribery and corrupt activities. Cary Cares is committed to acting professionally, fairly, and with integrity in all business dealings and relationships,

2.2 Cary Cares is bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct.

2.3 Cary Cares recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our charity is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our charity, and take our legal responsibilities seriously.

3. Who is covered by the policy?

3.1 This anti-bribery policy applies to all trustees and volunteers, or any other person or persons associated with us (including third parties).

3.2 In the context of this policy, third-party refers to any individual or organisation our charity meets and works with.

3.3 Prior to making any arrangements with a third party, our charity will ensure that the third party complies with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery

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

4.2 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.

4.3 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.

4.4 Bribery is illegal. Trustees and volunteers must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the trustees.

5. What is and what is NOT acceptable

5.1 This section of the policy refers to 4 areas:

Gifts and hospitality.

Facilitation payments.

Political contributions.

Charitable contributions.

5.2 Gifts and hospitality

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

5.2.1 It is not made with the intention of influencing the party to whom it is being given as an explicit or implicit exchange for favours or benefits from the charity.

5.2.2 It is not made with the suggestion that a return favour is expected.

5.2.3 It is in compliance with local law.

5.2.4 It is given in the name of the charity, not in an individual's name.

5.2.5 It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).

5.2.6 It is of an appropriate type and value, and given at an appropriate time (*e.g.* giving or receiving small gifts around Christmas where a client may have received regular ongoing support).

5.2.7 It is given/received openly, not secretly.

- 5.2.8 It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- 5.2.9 It is not above a certain excessive value, currently determined by the trustees to be £20.

5.3 Where 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 trustee board, who will assess the circumstances.

5.4 As good practice, gifts given and received should always be disclosed to the board of trustees. Gifts from suppliers should always be disclosed.

5.5 The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the board of trustees should be sought.

5.6 Facilitation Payments and Kickbacks. Cary Cares does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.7 Political Contributions: Cary Cares will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

6. Volunteer Responsibilities

6.1 All volunteers and trustees of Cary Cares 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 you are given.

6.2 All volunteers and trustees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the board of trustees.

6.4 If any volunteer or trustee breaches this policy, Cary Cares will cease to use them as a volunteer and take appropriate further action as necessary.

7. What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas:

- 7.1.1 How to raise a concern.
- 7.1.2 What to do if you are a victim of bribery or corruption.
- 7.1.3 Protection.

7.2 How to raise a concern: If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Cary Cares you are encouraged to raise your

concerns at as early a stage as possible, with the board of trustees.

7.3 Cary Cares will familiarise all volunteers with its whistleblowing procedures so volunteers can vocalise their concerns swiftly and confidentially.

7.4 What to do if you are a victim of bribery or corruption: You must tell the board of trustees as soon as possible if you are offered a bribe by anyone, or if you have reason to believe that you are a victim of another corrupt activity in relation to Cary Cares.

7.5 Protection: If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Cary Cares understands that you may feel worried about potential repercussions. Cary Cares will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7.6 Cary Cares will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

8. Training and communication

8.1 Cary Cares will provide training and/or information on this policy as part of the induction process for all new trustees and volunteers, and they will also receive regular, relevant training and/or information on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

8.2 Cary Cares' anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, and any third-parties at the outset of business relations, and as appropriate thereafter.

9. Record keeping

9.1 The board of trustees will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to trustee review.

10. Monitoring and reviewing

10.1 Cary Cares' board of trustees is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

