

Pioneering Care Partnership (PCP) Anti-Bribery and Anti-Corruption Policy



Aim

PCP is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. PCP takes a zero-tolerance approach. We are committed to acting professionally, fairly, and with integrity in all partnerships and business-relationships.

This policy aims to set out the responsibilities of and those who work for us and it acts as a source of information and guidance helping staff and volunteers to recognise and deal with bribery and corruption issues and understand their responsibilities and adhere to legal requirements.

Scope

All employees, volunteers, including trustees, will receive details of this procedure at induction. Breaches of this policy may result in disciplinary action or other procedures being evoked as necessary. This policy also extends to employees of partner organisations where PCP is the lead provider and multi-agency teams are established.

Exclusions

This Policy is non-contractual.

Definitions

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. 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.

Bribery is not limited to the act of offering a bribe, it also includes receiving a bribe.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). If unsure, further advice is available from HR.

Corruption is a form of dishonesty or a criminal offence which is undertaken by a person or an organisation which is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain.

Political corruption occurs when an office-holder or other governmental employee acts with an official capacity for personal gain.

This policy covers 4 areas:

- Gifts and hospitality
- Political contributions
- Charitable contributions
- Conflicts of interest

Gifts and hospitality

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

- a. 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.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is compliant with the law.
- d. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- e. 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).
- f. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- g. It is given/received openly, not secretly.
- h. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- i. It is not above a certain excessive value, as pre-determined by **PCP's Receipt of Gifts and Hospitality Policy**.
- j. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the relevant Senior Leader.

When anyone receives a gift they should immediately refer to PCP's Receipt of Gifts and Hospitality Policy to determine when to accept it and how to record that gift.

Giving of Gifts

PCP often uses gift to show its appreciation. It is acceptable to give gifts in the following circumstances and the limits should be appropriately applied:

Staff

Gift made on behalf of the Pioneering Care Partnership can only be made in the following circumstances, to ensure fairness. All receipts for these gifts should be given to Finance to process as staff expenses.

Circumstance	Who	Cost Code	Limit per head
<ul style="list-style-type: none">• Reward/thank you to staff for key achievements• One-off celebrations• Values Awards	Chief Executive, Deputy Chief Executive, Senior Leadership Team	Core	£50
<ul style="list-style-type: none">• Bereavement/long-term sickness etc.• Significant birthdays• Long Service Awards• Retirement	Budget Holder or HR	Project or Service Budget	£40

The giving and receiving of personal gift between staff members is acceptable and does not need to be recorded. Similarly optional staff collections for birthday, weddings, leaver etc. be organised by staff members.

Volunteers

To ensure fairness, PCP only provides volunteer gifts or hospitality in the following circumstances:

Circumstance	Who	Cost Code	Limit per head
<ul style="list-style-type: none">Annual thank you/volunteer celebrationLong Service AwardsSignificant birthdaysLeaving gifts	Senior Leadership Team or Project/Service Lead	Project or Service Budget	£15
Food and drink (allowable if individual has volunteered for 6 hours in a single day)	Senior Leadership Team or Project/Service Lead	Project or Service Budget	£5

PCP Expenses Procedures should be followed for all gifts, this includes providing receipts.

Externally

PCP should not give gifts to other organisations or external people. (This does not include multi-agency partnership teams).

Political Contributions

PCP will not make donations, whether in cash, in kind, or by any other means, to support any political parties or candidates.

Charitable Contributions

As a Charity PCP does not make any direct financial contributions (cash or otherwise) to other charities.

Conflict of Interest

PCP understands senior staff and trustees could be open to conflicts of interest and maintains a register to appropriately manage and mitigate against any potential conflict.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring, you are encouraged to raise your concerns as soon as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to HR.

What to do if you are a victim of bribery or corruption?

You must tell HR as soon as possible if you are:

- Offered a bribe by anyone
- If you are asked to make one,
- If you suspect that you may be bribed or asked to make a bribe in the near future
- Or if you have reason to believe that you are a victim of another corrupt activity.

Responsibilities

Trustees are responsible for approving and reviewing this Policy as part of the review cycle.

Senior Leaders are responsible for ensuring that the Policy is reviewed, disseminated and implemented.

Human Resources (HR) is responsible for ensuring that this Policy and associated procedures remain compliant with legislation.

Line Managers are responsible for applying the Policy within teams.

Employees are responsible for understanding and complying with the Policy and undertake any relevant training PCP deems appropriate.

Related Policies and Procedures

This Policy should be read in conjunction with the following PCP policies, procedures or guidance:

- Receipt of Gifts and Hospitality Policy
- Staff Expenses Policy
- Volunteer Policy
- Volunteer Handbook
- Whistleblowing Policy

Relevant Legislation

This Policy is in line with the following relevant legislation:

- Prevention of Corruption Acts 1906
- Bribery Act 2010

Policy Communication

PCP will ensure that:

- All employees receive a copy of this policy during the induction process;
- This policy is easily accessible by all members of the organisation;
- Employees are informed when a particular activity aligns with this policy;
- Employees are empowered to actively contribute and provide feedback to the policy, and;
- Employees are notified of all changes to this policy in a timely manner.

Monitoring and Review

This Policy will be reviewed on a regular basis to ensure that it remains compliant. A full formal review will also take place every 3 years by the Senior Leadership Team as part of the Policy Review Cycle, and where applicable approved by the Board of Trustees.

April 2024

Policy document tracking

Action	Date(s)
Draft to SLT:	10 January 2024
Approved Policy circulated to SLT:	13 February 2024
Approved Policy uploaded to shared and circulated to staff:	29 March 2024
Uploaded on to website	29 March 2024
Interim Review Date:	February 2025
Main Review Date:	February 2027
SLT Lead for Review	Governance and Development Manager

If this policies or procedure is not reviewed in line with the review date indicated then this version remains valid until such time it is updated and reviewed.