Anti-corruption and Bribery

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1. Background of the policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption, and we are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment, and we may amend it at any time. The policy will be reviewed regularly.

2. Who must comply with this policy?

This policy applies to all persons working for Soundabout or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, freelance practitioners, agents, contractors, external consultants, third-party representatives, and business partners.

3. What is bribery?

"Bribe" means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

"**Bribery"** includes offering, promising, giving, accepting, or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, please raise it with your line manager.

Specifically, you must not:

- give or offer any payment, gift, hospitality, or other benefit with the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know, or any offer you suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

Other specific prohibitions relevant to the business: You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking into account the actual reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in the name of Soundabout, not your own name.

Promotional gifts of low value such as branded stationery may be given to, or accepted from, existing service users, suppliers and business partners.

5. Record Keeping

You must declare and keep a written record of all hospitality or gifts given or received to your Line Manager. You must also submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for the expenditure.

All accounts, invoices and other records relating to dealings with third parties, including suppliers and service users, should be prepared accurately and completely. Accounts must not be kept “off book” to facilitate or conceal improper payments.

6. How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with our whistle-blowing policy, as soon as possible.

Review

	Date	**Completed by**

First Written	**May 2023**	**Maryse Degbegni (from solicitor)**
Trustee Approval	**July 2023**	**Simon Claridge**
Reviewed	**July 2024**	**Ben Weston-Conway**

Soundabout, John Eccles House, Robert Robinson Avenue, Oxford Science Park, Oxford OX4 4GP
Website: www.soundabout.org.uk
Email: info@soundabout.org.uk Tel: 01235 797474
Registered Charity No. 1103002
Company Limited by Guarantee No. 5023067