

Anti-bribery policy

Last Updated: Jan 2024
To be reviewed: Jan 2025
Approved by: Laura Taylor

Key points...

1. This policy applies to all employees and contractors

Anti-bribery policy

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in the RHA to ensure that no bribery occurs.

Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in the RHA:

- Accepting any financial or other reward from any person in return for providing some favour
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward from any person in return for providing some favour.

Business gifts

From time to time, members, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small must be reported to the appropriate Director and recorded. No gifts with a value of more than £50 may be accepted. If a gift is offered, then refused because of its value, this must be reported to the appropriate Director.

Hospitality

From time to time, members, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the appropriate Director. Permission must be given by the Director before an employee accepts any invitation.

Offering gifts and hospitality

It is RHA's custom to offer small gifts (e.g. pens, diaries) to members, suppliers and other persons. If a gift is authorised (by the relevant Director) the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

The RHA occasionally runs hospitality events, an employee must not organise any additional hospitality event without seeking authority from his or her Director.

Responsibilities of the Directors

Directors are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in the Director's area of responsibility. Please note promotional items such as mugs, coasters, pens etc. do not need to be recorded.

If Directors are concerned about any actions, they should contact the Managing Director immediately for advice.

Directors are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Directors must authorise all expense claims from their employees. Directors are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her Director immediately.

Donations to organisations

No employee should make corporate donations to a charity without approval of the appropriate Director.

No donations should be made to charities, political parties or other RHAs with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns

If an employee is concerned that acts of bribery are occurring in the RHA they should inform their line manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.

If you have any queries about this policy, please contact a member of the HR team