

CARE International UK
Anti-Bribery Policy

Scope of policy:	World-wide: applies to all CIUK activities within the UK, and programme countries including Country Offices and programme partners. Applies to all CIUK trustees, volunteers and staff; partners, suppliers and consultants.
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<p>Related policies: Code of Conduct Ethics Statement Delegated Authorities Conflict of Interest Policy Fraud and Corruption Policy</p> <p>Statutory regulation: UK Bribery Act 2010: https://www.gov.uk/government/publications/bribery-act-2010-guidance</p>

1. Definitions

Bribery is defined as *"an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust in the conduct of the enterprise's business"*.

Bribery can take many forms. It may be a straightforward request for payment in cash; a request for a favour or in-kind; an unusually large gift, entertainment or hospitality.

We recognise the risk of working in countries with weak control and regulatory environments, which increases exposure to bribery and corruption risk.

We have a **zero tolerance** to bribery and corruption, ensure we do not endorse bribery or corruption in any form, and are committed to ensuring our business processes minimise the risk of funds being diverted for bribery or corruption through our financial control environment including delegation of authorities and segregation of duties.

CIUK prohibits: the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement;

to or from: any person or company, wherever they are situated and whether they are a public official or body, private person or company;

by: any individual employee, agent or other person acting on CIUK's behalf;

in order to: gain any commercial, contractual or regulatory advantage for CIUK in a way which is unethical

or in order: to gain any personal advantage (financial or otherwise) for the individual or anyone connected with the individuals.

2. Key controls

To ensure we meet CIUK's obligations under the Anti-Bribery Act we rely on the following controls:

- **Top-level commitment:** The Board of Trustees and Senior Management Team are committed to preventing bribery by persons associated with it. We demonstrate this by:
 - ensuring this risk is reviewed alongside other risks on the Risk Register
 - promoting the organisation's Code of Conduct
 - annual review of the Control Environment by the Board: the governance structures, policies and procedures in place
 - reporting, under our Fraud and Corruption Policy, to the Finance and Audit Committee
- **Staff:** awareness through training and induction, including the Code of Conduct, to ensure ability to recognise and avoid bribery and corruption. We encourage employees to be vigilant and to report any suspicion of bribery, through the Fraud and Corruption reporting process, or through the Whistleblowing process.

Acceptance of Gifts: the policy does not prohibit the following practices:

- normal and appropriate hospitality
- the giving of a ceremonial gift at a festival or other special occasion
- the offer of resources to assist in making a decision more efficiently, provided that they are supplied for that purpose only.

All gifts and hospitality over £100 must be disclosed to the Finance Director through the Conflicts of Interest declaration, and included in the Register of Interests.

- **Investigation:** Under our Fraud and Corruption Policy, all instances of alleged bribery are investigated, reported to the relevant authorities and action taken against individuals as appropriate.

5. Reporting

Any trustee, volunteer or employee who identifies or suspects that an act of bribery has occurred **must report this immediately** using the procedures set out in the Fraud and Corruption Policy.

Policy owner: Finance Director

Last updated: January 2018

Next review: January 2020