

Caban Y Faenol CYF

Bribery & Corruption

Caban Y Faenol commits to conducting all its business in an open and moral way. We take a strong stance against bribery and corruption, and we are committed to operating professionally, fairly and with honesty in all our business commitments and relationships.

In the UK, the Bribery Act 2010 makes bribery and corruption illegal, and also holds us accountable for failure to implement sufficient procedures to prevent such activities by those working for or on behalf of the organisation, regardless of where in the world the activity takes place. Corrupt activities carried out abroad, including those by partners or consultants working directly on behalf of the Caban Y Faenol Cyf, may lead to prosecution.

To whom is the Bribery and Corruption Policy relevant?

This policy is relevant to every person working for or on behalf of Caban Y Faenol Cyf, in any role, including:

- directly employed workers
- officers / trustees (e.g. Management Committee Members)
- agency workers
- volunteers
- agencies
- contractors
- external consultants
- third party representatives
- business partners

Any employee or volunteer found to be in breach of this policy faces disciplinary action, which in cases of serious misconduct may lead to dismissal.

If any occasional worker or contractor breaches this policy their contract will be terminated immediately.

What are Bribery and Corruption?

Bribery means an incentive or reward (financial or otherwise) for operating in a way that is illegal, immoral, a breach of trust or inappropriate in any way. Bribery may take the form of money, gifts, loans, fees, hospitality, services, discounts, contracts awarded or any other advantage or benefit. Bribery includes offering, promising, giving, receiving or attempting bribery.

All types of bribery are strictly forbidden. If you are unsure as to whether a specific activity constitutes bribery, you should raise it with your Manager, Registered person, CIW

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Code of Practice

Caban Y Faenol Cyf commits to refraining from:

- giving or receiving any payment, gift, hospitality or other offering in the expectation that in exchange it will receive a business advantage, or to reward any business received;
- accepting any gift from a third party which you know or suspect to be offered with the expectation that Caban Y Faenol Cyf will provide them or anybody else with a business advantage;
- giving or offering any payment (sometimes called a facilitating payment) to a government officer in any country to facilitate or speed up a regular or necessary procedure.

Gifts and Hospitality

This policy does not forbid the giving or receiving of reasonable and appropriate hospitality for purposes such as:

- fostering relationships,
- maintaining Caban Y Faenol Cyf's image or reputation,
- marketing Caban Y Faenol Cyf's produce and service.

This policy does not forbid the giving or receiving of reasonable and appropriate gifts to acknowledge special events, for example, Christmas gifts, gifts given to children leaving the setting to attend school, or to thank members of staff/ volunteers for a period of service at Caban Y Faenol Cyf as they leave the role. In these cases, there is no need to record every gift individually-only refer to general giving and receiving of gifts. Gifts must be of a type and value appropriate to the circumstances and the reasons for making the gift. Gift should not include ready money, nor be given in secret. Any gift with a monetary equivalent (such as vouchers) must be recorded appropriately.

Gifts or hospitality will be considered inappropriate if they are excessive or improper, or if they can be considered as an incentive or reward for favourable treatment (for example, given during contractual negotiations or the tendering process). Gifts must be made in the name of Caban Y Faenol Cyf, not in the name of an individual.

Promotional items of a low value, such as branded writing paper, may be given or received by customers, suppliers and current business partners.

All **staff/ volunteers/ officers/ trustees** must ensure that all expense claims relating to hospitality, gifts or outgoings paid to a third party are submitted in accordance with Caban Y Faenol's expenses/ overheads policy and record the specific reason for the expenditure.

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All accounts, invoices and other records pertaining to dealings with third parties, including suppliers and customers, should be prepared quickly and accurately. Accounts should not be kept “off the books” to hide or facilitate inappropriate payments.

How to express concern

If you are offered a bribe, asked to make a bribe, or if you suspect that any bribery, corruption or breach of this policy has taken place or will take place you must inform the Manager/Registered person or report it in accordance with the Whistleblowing Policy as soon as possible.

Associated Policies

Whistleblowing Policy