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## Anti Bribery Policy

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### Policy Aims:

- The Circuit recognises that as a charitable organisation it has a legal duty under the Bribery Act 2010 (section 7) to put in place measures to prevent any person associated with the Banbury Circuit undertaking bribery and corruption.
- To protect volunteers and staff from false accusations
- It is prohibited, directly or indirectly, for any person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Circuit, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

### Scope:

This policy applies to all church volunteers and paid staff working on behalf of the church. Bribery is a criminal offence. The Circuit prohibits any form of bribery. We require compliance, from everyone connected with our Circuit, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by our own employees, ministers, volunteers', or by third parties acting for or on behalf of the Methodist Churches in the Banbury Circuit.

### Definition:

*What is "bribery"?*

The essence of the UK law offence of bribery is that a person offers promises or gives another person a financial or other advantage intended to induce the other person to improperly perform a function or activity or to reward that person for such improper performance or where it is known that the acceptance of the advantage by that person is itself improper performance of a function or activity, provided that a person performing the function or activity is expected to perform it in good faith, impartially, or by performing it is in a position of trust. A function or activity is performed improperly when it is performed in breach of what a reasonable person in the UK would expect in relation to the performance of the type of function or activity involved.

### Procedures:

Any employee or anyone associated with the Banbury Circuit who suspects that there is bribery or corruption must report it to the Circuit Complaints Officer.

If you are offered a bribe or asked to make a bribe you must report this. The Circuit is committed to ensure that no one suffers any detriment as a result of refusing to accept or take part in bribery or corruption or reporting their concerns or suspicions of bribery or corruption in good faith.

If we suspect that an act of bribery or attempted bribery has taken place, an investigation will be carried out in line with our disciplinary procedure and where appropriate, action may be taken, which may result in dismissal, or the cessation of any business arrangement.

Staff are reminded of the Circuit's Whistleblowing Policy.

### **Gifts and Hospitality:**

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in the course of carrying out the Circuits' work. This does not constitute bribery where it is proportionate and recorded properly. No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our work without receiving prior written approval from the Superintendent Minister. Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Superintendent Minister.

### **Trivial gifts, or entertainment or hospitality**

Nothing in this policy or the anti-bribery and corruption policy shall prohibit the giving or receiving of trivial gifts of a promotional nature (for example sweets, pens or diaries) or provision of entertainment or hospitality of a trivial nature (for example buying someone a cup of coffee or a sandwich for lunch on a social occasion or event).

### **Record Keeping:**

A record will be made by the Circuit Treasurer of every instance in which gifts or hospitality are given or received. As the law is constantly changing, this policy is subject to review and the Circuit reserves the right to amend this policy without prior notice.

### **Further Information:**

Can be found at <https://www.gov.uk/anti-bribery-policy>

**Signed:** ..... (Superintendent Minister)

**Dated:** .....

**Date for review:** February Circuit Meeting