

# Anti Bribery Policy

**Compass Disability Services**  
Units 11 – 12 Belvedere Trading Estate  
Taunton TA1 1BH

July 2015  
Review: July 2020

## Introduction

The purpose of this policy is to set out Compass Disability Services responsibilities, and of those working for us, in observing and upholding our position on bribery; and to provide information and guidance to those working for us on how to recognise and deal with bribery issues.

There are four criminal offences under the UK Bribery Act 2010 these are: being bribed, bribing another, bribing a foreign official and failing to prevent bribery.

As detailed in the UK Bribery Act 2010, Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if Compass Disability Services is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. Compass Disability Services therefore takes its legal responsibilities very seriously.

## Definition

For the purposes of this policy:

**“third party”** means any individual or organisation that an employee comes into contact with during the course of their work for Compass Disability Services.

**“workers”** means all individuals working at all levels including employees, volunteers and trustees, consultants, contractors, seconded staff, and agency staff, or any other person associated with us wherever located.

**“bribery”** means giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

## Responsibilities

All workers must ensure that they read, understand and comply with this policy at all times.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Compass Disability

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Services or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers must notify the Chief Executive Officer or the chair of the Board of Trustees as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other workers if they breach this policy.

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. They are further responsible for ensuring that an appropriate risk assessment is carried out regularly to identify the particular risks to Compass Disability Services and its workers.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

### **What risks do we face?**

We have identified that the following are particular risks for our business:

- A worker being induced to authorise and process an expense which he/she knows or believes to be illegitimate
- A worker being induced to record information which he/she knows or believes to be false
- A worker being induced in an unethical way to provide a third party with a commercial or contractual advantage.
- A worker offering a bribe to secure a commercial or contractual advantage.

Workers should be aware of these particular risks, and take extra care if they are handling a situation in which they might be exposed to such risks.

### **What is not acceptable?**

It is not acceptable for a worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

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- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- offer or accept hospitality involving entertainment of a sexual or similarly inappropriate nature;
- solicit or try to solicit any gift or hospitality from a third party;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

If you are unsure whether your actions would be acceptable or not, please consult with the Chief Executive Officer before proceeding.

## Gifts

Our policy on the acceptance of donations, personal gifts and bequests is laid down in our Donations and Bequests Policy

## Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided it falls within reasonable bounds of value and occurrence.

Although no two situations are ever the same, using the following indicators will help us to evaluate what would be considered acceptable:

- What is the intent behind the hospitality – is it to build a relationship or is it something else?
- How would it look if details of the hospitality were made public? Would we feel embarrassed?
- What if the situation were reversed – would there be a double standard?

Entertainment of third parties may only be arranged by or with the consent of the Chief Executive Officer or the Chair of the Board of Trustees.

## Record-keeping

Compass Disability Services keeps financial records and will have appropriate internal controls in place that will evidence the business reason for making payments to third parties.

Workers must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review.

Expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our Expense Claim Procedures and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating

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to dealings with third parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### **How to raise a concern**

Workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Employees, including permanent and short term employees, as well as those on secondment, external consultants, contractors and agency staff should refer to the Whistle Blowing Policy and procedure that details the safest way to raise such concerns. Volunteers should raise their concerns using "How to make a complaint" procedure as referenced in the Complaints Policy.

### **Training and communication**

All workers will be introduced to this policy at induction. It will be available on the organisations Intranet and main web page.

Our zero-tolerance approach to bribery and corruption must be communicated to all operatives, agencies, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **Policy Revisions**

This policy will be reviewed every five years and amended as necessary or earlier in accordance with forthcoming legislation.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

This policy does not form part of any employee's contract of employment and it may be amended at any time

### **Additional Information:**

Donations and Bequests Policy

Whistle Blowing Policy

Volunteers Expenses Policy

Expenses Policy

Finance Policy

Complaints Policy

Expenses Claim Procedure

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