

# Connected Voice

## Anti-bribery Policy

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### Document details and review

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Signed by responsible person:

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This policy will be reviewed every two years

## 1. Introduction

A zero-tolerance approach is applied to bribery and corruption at every level in Connected Voice. This policy provides guidance in accordance with the Bribery Act 2010. If any person is concerned about any business or other dealing, irrespective of the Act, then it should be reported immediately to the Chief Executive, or in her absence (or in any issue that may involve the Chief Executive), to the Chair of the Trustees.

The Connected Voice Anti-bribery policy applies to all individuals working or volunteering with Connected Voice, including senior managers, officers, trustees, employees (whether permanent or temporary), and volunteers, or any other person associated with Connected Voice. It also applies to third parties. In this policy, third party means any individual or organisation that Connected Voice comes into contact with during the course of its work, including actual and potential clients, customers, suppliers, distributors, business contacts, members, service users, partners, donors, fund holders, agents, advisers and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

A copy of the Connected Voice Anti-bribery policy will be available on the Connected Voice website and will be referred to when conducting business with third parties as mentioned above.

## 2. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

In general, other than in the normal course of the day to day business where expenses, such as coffees during a meeting and so forth, are usual, Connected Voice actively discourages any level of other gift or broader hospitality. However, the aim of this policy is not to prohibit normal and appropriate hospitality being given to, or received from, third parties.

Gifts or hospitality must not however be given or received with the intention of influencing us, or a third party, to provide a business or personal advantage. If in doubt, please discuss the issue with the Chief Executive or appropriate Line Manager.

Connected Voice employees, trustees, volunteers (or any person associated with Connected Voice) should ensure the hospitality or gift received:

- ✓ Complies with UK law
- ✓ Is given in the name of Connected Voice and not in an individual's name

- ✓ Does not include cash or a cash equivalent (such as gift vouchers)
- ✓ Is appropriate e.g. it is not unusual for small gifts to be given at Christmas (under the value of £10)
- ✓ Considering the reason for the gift, it is appropriate in terms of type, value and timing
- ✓ Is given openly, not secretly and
- ✓ It is not accepted from government officials or representatives, or politicians or political parties, without the prior approval of the Chief Executive

If a gift is received in the Connected Voice office, it is custom and practice to share this with the rest of the staff and volunteers present at the time (e.g. a box of chocolates from a grateful beneficiary).

The receiving of gifts should not become a regular feature and if there are indications of a pattern emerging of inappropriate giving or receiving of gifts then this should be reported to:

- The Chief Executive
- Volunteer Supervisor in the case of a Connected Voice volunteer
- The Connected Voice Advocacy Manager in the case of an advocacy partnership (Appendix 1)
- Advocacy Co-ordinator in the case of an advocacy volunteer (Appendix 1)

Any gift received should be recorded in the Connected Voice Gift Log saved in the common shared folder at [Gift Log](#) (Appendix 2).

Gifts given to or received by staff, volunteers and trustees as individuals must not have a value greater than £10. If the gift has a value greater than £10, the recipient must discuss this with the Chief Executive.

It is not acceptable for any person associated with Connected Voice (or any person acting on behalf of Connected Voice)

- ✓ To give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that an advantage will be received, or to reward an advantage already given
- ✓ Accept payment from a third party when it is suspected that it is offered with the expectation that it will obtain a business advantage for them or an advantage will be provided by Connected Voice in return
- ✓ Accept a gift or hospitality from a third party if it is suspected that it is offered or provided with an expectation of a business advantage
- ✓ Threaten or retaliate against another employee, trustee or volunteer who has refused to commit a bribery offence or who has raised concerns under this policy or engaged in any activity that might lead to a breach of this policy

### **3. Responsibilities of Employees, Trustees and Volunteers**

All employees, trustees and volunteers must read, understand and comply with the Connected Voice Anti-Bribery Policy. This policy will be communicated to all new staff, trustees and volunteers as part of their induction process and will be communicated to existing staff, trustees and volunteers.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working with or for Connected Voice.

Employees, trustees and volunteers must notify the Chief Executive as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example anyone who offers a Connected Voice employee, trustee or volunteer something to gain a business advantage, or indicates that a gift or payment is required to secure their business.

Connected Voice is required to keep financial records which will evidence the business reason for making any payments to third parties. All employees, trustees and volunteers must therefore keep a written record of all hospitality or gifts accepted or offered and ensure that all expenses claims, whether relating to hospitality, gifts or expenses incurred, are submitted in accordance with the Connected Voice expenses policy and specifically record the reason for the expenditure and that it was incurred in the proper course of the activity of Connected Voice.

Connected Voice sometimes is offered the use of a free meeting room, charity discounts or a limited amount of professional advice as part of an organisation or company's corporate responsibility to charities. The Chief Executive will decide whether or not to accept this benefit to the charity.

Connected Voice occasionally accepts or donates second hand furniture and considers this to be part of the Connected Voice Environmental Policy. This is seen as a way of sharing resources and no incentive is expected or gained. The Chief Executive will authorise the giving or receiving of second hand goods.

Any significant decisions on corporate sponsorship and business partnerships will be considered by the Connected Voice trustees before any agreements or contracts are entered into.

It is Connected Voice' policy that no gifts of cash or cash equivalent (such as gift vouchers) should be accepted by employees, trustees and volunteers from third parties. Any such gifts received are deemed to be a donation to Connected Voice and will be treated as such and duly recorded as appropriate.

Any employee who breaches this policy may face disciplinary action in line with the Connected Voice Disciplinary Policy and Procedure.

### **4. Areas of risk – red flags**

Connected Voice considers the following circumstances to be areas of risk and most likely to raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- ✓ An employee, trustee or volunteer becomes aware that a third party engages in, or has been accused of engaging in improper business practices
- ✓ A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or fails to provide an invoice or receipt for a payment made
- ✓ A third party offers (or demands) entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- ✓ An invoice from a third party appears to be non-standard or customised
- ✓ An unusually generous gift is offered or undue hospitality by a third party

## **5. Raising concerns**

All employees, trustees and volunteers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage or if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. If you are unsure whether a particular act constitutes bribery or corruption, or if you have other queries, these should be raised with the Chief Executive.

Connected Voice encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Connected Voice is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If an employee, trustee or volunteer believes they have received unfair treatment then the matter should be raised with the Chief Executive or, if it is not remedied and it is an employee of Connected Voice, then it should be raised formally through the Connected Voice Grievance procedure.

Connected Voice has a Whistle Blowing policy in place which will be observed if a concern is raised by an employee, trustee or volunteer about bribery within the organisation.

## **6. Choice of partners**

Connected Voice as part of the voluntary and community sector will seek to work with a broad range of organisations. In the main the choice of partners will come from:

- ✓ The voluntary and community sector
- ✓ Other infrastructure organisations

- ✓ The public sector
- ✓ Charitable trusts
- ✓ Learning institutions
- ✓ Private sector as appropriate

## **7. Assessing risk of bribery**

Connected Voice considers the risk of bribery within the organisation as being minimal. It is a small sized organisation that operates within the local area and with partners known to the organisation.

When assessing the risk of bribery within Connected Voice it was considered minimal because of the following:

- ✓ Employees, trustees ,volunteers and third parties are made aware of the Connected Voice Anti-Bribery Policy
- ✓ Connected Voice does not operate overseas
- ✓ Choice of partners are known to Connected Voice and have good procedures in place
- ✓ Connected Voice has financial procedures in place which minimise the opportunity of bribery occurring
- ✓ A risk assessment is carried out on new business partners if they are not known to Connected Voice
- ✓ Trustees declare conflict of interest at all board meetings
- ✓ Connected Voice has recruitment guidelines in place to minimise any bribery opportunities on interview panels
- ✓ Gifts received are logged on the Connected Voice Gift Log

## **8. Equity, Diversity and Inclusion**

The Connected Voice Equity, Diversity and Inclusion Policy will be observed when administering the Anti-bribery Policy.

## **9. Monitoring and review**

Connected Voice will monitor the effectiveness of this policy and it will be reviewed every two years.

## Appendix 1 – Connected Voice Advocacy Gifts Policy (Receiving and Giving)

A fundamental underlying principle of independent advocacy is that it should be free of charge to all eligible people. Offers by individuals in receipt of advocacy to reward staff or volunteers, in effect, undermines this principle.

Staff members and volunteers should therefore under no circumstances receive gifts in the form of money from partners. Neither should they give or lend money to partners.

Connected Voice Advocacy (CVA) also, in general, discourages the giving and receiving of gifts in kind.

However, it is recognised that in some circumstances refusal to accept gifts can cause offence. For instance, the exchange of small Christmas presents or the giving of birthday presents can be significant to individual partners who, due to isolation, may have no other opportunities to offer or receive tokens of appreciation. However, this should never become a regular feature of any advocacy partnership and if there are indications of a pattern emerging of inappropriate giving/receiving gifts, the CVA Manager should be alerted.

Such token gifts given to or received by staff or volunteers must in any case not be worth over £10. In the case of volunteers they should be reported as soon as possible to the relevant Advocacy Co-ordinator. In the case of staff, they should be reported as soon as possible to the CVA Manager. In exceptional circumstances, Connected Voice Advocacy will take appropriate action to address the issue.

A register of gifts received and given is maintained and stored electronically at [Gift Log](#)

<b>Appendix 2 – Connected Voice – Gift Log</b>
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The Connected Voice Gift Log is accessible to all staff and is saved in [Gift Log](#)

<b>Item</b>	<b>Who from</b>	<b>Who to</b>	<b>Value</b>	<b>Manager informed</b>	<b>Accepted</b>	<b>Not accepted</b>