

SUE LAMBERT TRUST ANTI BRIBERY GUIDELINES AND PROCEDURES

All employees, volunteers and Trustees of SLT should be aware of their responsibilities should they be offered or asked for a bribe. These guidelines set out steps which should be taken:

1. How to evaluate what is 'acceptable':

First, take a step back and ask yourself the following:

- What is the intent – is it to build a relationship or is it something else?
- How would this look if these details were on the front of a newspaper?
- What if the situation were to be reversed – would there be a double standard?

If you find it difficult to answer one of the above questions, there may a risk involved which could potentially damage SLT's reputation and business. The action could well be unlawful.

Circumstances which are never permissible include examples that involve:

- A “quid pro quo” (offered for something in return)
- Gifts in the form of cash/or cash equivalent vouchers

Possible circumstances that are usually acceptable include:

- Modest/occasional meals with someone with whom we do business
- Occasional (i.e. no more than twice per year) attendance at ordinary sports, theatre and other cultural events
- Gifts of nominal value, such as pens, or small promotional items

Individuals should reject demands for or offers of bribes and SLT's anti-bribery stance should be made clear. Staff should report any such approaches immediately to the CEO, or where it is suspected that the CEO is involved to a member of the Board of Trustees.

Indicators that there may be corruption/bribery taking place (taken from the Serious Fraud Office website, 31 August 2011)

This list is not exhaustive but key indicators you should beware of:

1. Abnormal cash payments
2. Pressure exerted for payments to be made urgently or ahead of schedule
3. Private meetings with public contractors hoping to be contracted by SLT
4. Lavish gifts being received
5. Making unexpected or illogical decisions accepting projects or contracts
6. Unusually smooth process of cases where individual does not have the expected level of knowledge or expertise
7. Abusing decision process or delegated powers in specific cases
8. Agreeing contracts not favourable to the organisation
9. Unexplained preference for using certain contractors

10. Bypassing normal contracts procedure
11. Invoices being agreed in excess of contract without reasonable explanation
12. Missing documents or records regarding meetings or decisions
13. Procedures or guidelines not being followed.

2. Where bribery is suspected or where it occurs

To enable proper investigation, employees, volunteers and Trustees should record the details of any bribery or requested or attempted bribery, as soon as possible after the event. Any instances of actual or potential bribery should be promptly reported to the CEO and Chair of Trustees and promptly and properly investigated by a member of the management team.

Where the suspected bribery is alleged to have been offered or accepted by the CEO or the Chair of Trustees they will be immediately suspended from duty pending an investigation.

Overseeing the investigation will then be delegated to another trustee – who will also take Chair's responsibility pending the outcome of the investigation.

3. Investigation procedures

The objectives of an investigation should be to:

- Confirm whether or not a bribe has taken place, and to identify who was responsible.
- Confirm whether internal controls and anti-bribery procedures have worked in practice.
- Identify any improvements required to anti-bribery procedures.

Depending on the findings of the investigation, subsequent action will be determined. This may involve disciplinary action against staff or trustees involved or external reporting to:

- A senior official or director of another organisation, if the person making the bribe is from that organisation
- Local police/ law enforcement agencies (if deemed appropriate)
- Serious Fraud Office (in the UK, the SFO has primary responsibility for the UK Bribery Act)
- Relevant government department where the bribe took place
- The Charity Commission, if the matter is considered a "serious incident"