

FULFILLING FUTURES CHARITY

ANTI CORRUPTION AND BRIBERY POLICY

Who is this policy for?

This policy applies to all people in the Fulfilling Futures Charity.

This could include all trustees, employees, volunteers, teachers, sponsors or any other person associated with the charity.

Our policy's purpose

It is our policy to conduct all of our activities both honestly and ethically. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. This includes implementing and enforcing effective systems to counter bribery and corruption.

We uphold all UK laws essential to countering bribery and corruption in the jurisdictions where we operate, including the Bribery Act 2010, in respect of our conduct at home and abroad.

How this policy works

We take our legal responsibilities very seriously. It is a criminal offence to offer, promise give, request or accept a bribe to or from third parties.

What are corruption and bribery?

Corruption

Corruption is the abuse of entrusted power or position for private gain.

Bribery

Bribery is offering, promising or giving or accepting a financial or other advantage intended to coerce someone into acting illegally, unethically or unjustly or rewarding them for doing so.

An advantage includes

Money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

Unacceptable behaviour

It is unacceptable for a someone within the charity too:-

1. Give, promise or offer a payment, gift or hospitality with the expectation of gaining a business advantage, or to reward a business advantage already given.
2. Give or accept a gift or hospitality during commercial negotiations or tender process if this could be perceived as intended or likely to influence the outcome.
3. Accept a payment, gift or hospitality from a third party that an individual knows or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return.
4. Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
5. Threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns under this policy.
6. Engage in any other activity that might lead to a breach of this policy.

Facilitation payments or kickbacks

We do not make or will accept facilitation payments or kickbacks of any kind.

What are facilitation payments?

Also known as back handers or grease payments, they are typically small payments made to secure or speed up a routine or necessary action.

What are kickbacks?

Kickbacks are typically payments made in return for a business favour or advantage.

Gifts, hospitality and expenses

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties for the purposes of:-

Establishing or maintaining good working relationships

Improving or maintaining our image or reputation

Marketing or presenting our products and services effectively.

The giving and accepting of gifts is allowed in certain circumstances.

1. The gift is not made with the intention of obtaining or retaining business, favours, or benefits or rewarding them.
2. The gift is given in the charity's name and not in individual's name.
3. The gift is appropriate in the circumstances, taking account of the reason for the gift, its timing and its value.
4. The gift is open rather than secretly.

Promotional gifts of low value such as branded stationery to or from existing partners is usually acceptable etc.

Reimbursing a third party's expenses would not usually amount to bribery.

Record keeping

The charity must keep detailed financial records and have appropriate internal controls in place to evidence all its business dealings.

All accounts, invoices and records relating to the charity should be completely accurate and transparent. They should be audited yearly and a copy sent to the charity commission, with an annual report of activities undertaken within the charity.

Employees

Employees must ensure to read, understand and comply with this policy.

Employees are required to avoid any activity that might lead to or suggest a breach of this policy. The prevention and reporting of bribery and other forms of corruption are the responsibility of all those involved and acting on behalf of the Fulfilling Futures Charity.

Raising a concern

Our employees are encouraged to raise concerns about any issue or suspicion of bribery or corruption as early as possible. If they are offered a bribe or asked to make one a breach of this policy may have taken place and they must notify the chair of the charity.

Protection

Employees or people involved in the charity who refuse to accept or offer a bribe, or who raise concerns or report another's wrong doing, are sometimes worried about repercussions.

We encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if it turns out to be a mistake.

We are committed to ensuring that nobody suffers detrimental treatment as a result of refusing to take part in bribery or corruption or because of reporting their suspicion or an actual or potential offence.

Training and communication

People who are new or involved in the charity will be encouraged to read all relevant policies to their role. Employee training eg sponsorship co-ordinator in Uganda will have her link trustee to keep her updated by email and facetime on new policies or instructions.

We have a zero-tolerance approach to bribery and corruption and this needs to be made aware to all people involved in the charity.

Breaches of this policy

All people involved in the charity etc. could face disciplinary action and asked to resign their role, if misconduct or gross misconduct are detected.

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